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June 11, 1996
Due Date

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Originator Name

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QA Approval

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Document Subject

TRANSMITTAL OF THE DRAFT IMPLEMENTATION GUIDANCE DOCUMENT – AMP-070-96

KH-00003NS1A

96-RM-ER-0101-KH

Discussion and/or Comments

DOCUMENT CLASSIFICATION REVIEW WAIVER
PER CLASSIFICATION OFFICE

The Draft Implementation Guidance Document (IGD) of the Rocky Flats Cleanup Agreement (RFCA) without the appendices is attached for your review and comments. As discussed, the complete document including the appendices will be transmitted after final review. You will find that this document has undergone a great deal of revision since your last review.

The attached project schedule outlines the expected next steps in the development of this document. Please note that we are recommending a roundtable review with the working group on July 2, 1996. As you can see, the schedule is pretty tight. It is critical that we get this document to the working group as soon as possible.

Please let us know if you have any questions or need additional information. We look forward to your comments.

jm

Attachments:
As Stated (2)

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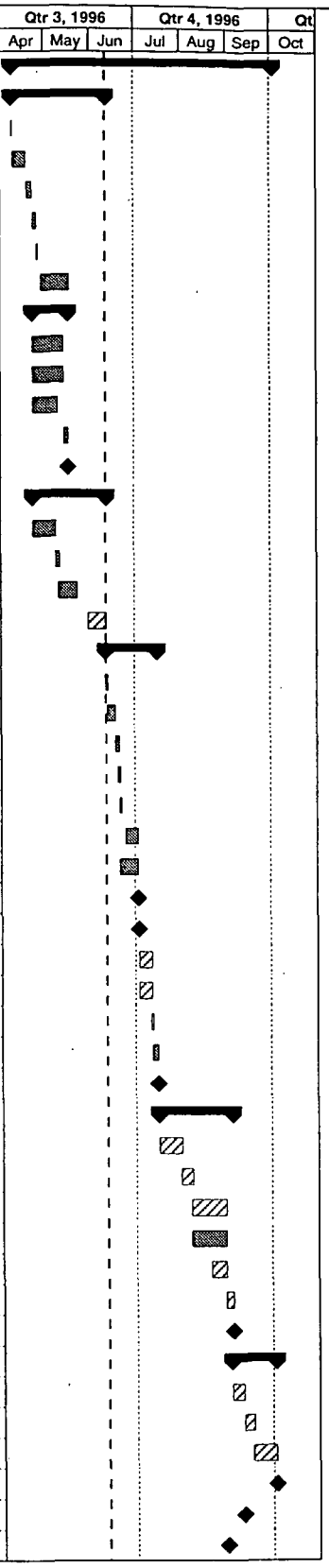
1/69

SW-A-004269

IGD Schedule

ID	Name	Duration	Scheduled Start	Scheduled Finish	Predecessors
1	PREPARE RFCA IMPLEMENTATION GUIDANCE DOCUMENT	110.89d	4/9/96	10/2/96	
2	Preliminary Draft IGD	40.11d	4/9/96	6/11/96	
3	Attend RMRS-Internal Planning Meeting	0.89d	4/9/96	4/9/96	
4	Issue Preliminary Assignments and Schedule	6.22d	4/10/96	4/18/96	3
5	Attend Kick-Off Meeting with K-H Client	1.78d	4/19/96	4/22/96	4
6	Prepare Estimates of Manhours Needed	2.67d	4/23/96	4/25/96	5
7	Submit Manhour Estimates	0.89d	4/26/96	4/26/96	6
8	Identify and Prepare WAD / Work Package Documentation	13.33d	4/29/96	5/17/96	7
9	Prepare Controversial Sections	16d	4/23/96	5/16/96	
10	Prepare Preliminary Draft Section 2 (Integration)	13.33d	4/23/96	5/13/96	5
11	Prepare Preliminary Draft Section 3 (Approach & Proced	13.33d	4/23/96	5/13/96	5
12	Interact With K-H Contact for Assigned Section	11.56d	4/23/96	5/9/96	5
13	Deliver Preliminary Draft Sections 2 & 3	2.67d	5/14/96	5/16/96	11,12,6,10
14	Issue Preliminary Draft Sections 2 & 3 to K-H	0d	5/16/96	5/16/96	13
15	Prepare Other Sections: 1, 4, 5, & Glossary (Sec 6 by K-H)	31.22d	4/23/96	6/11/96	
16	Prepare Preliminary Draft of Other Sections.	10d	4/23/96	5/8/96	5
17	Issue Other Sections for Internal Review	2d	5/8/96	5/10/96	16
18	Review Other Sections Internally	7d	5/10/96	5/22/96	17
19	Incorporate or Resolve Internal Comments	7d	5/30/96	6/11/96	18
20	Draft IGD Sections for Agency Discussion	19.67d	6/11/96	7/15/96	
21	Submit to K-H for Final Review	1d	6/11/96	6/12/96	19
22	K-H Review	2d	6/12/96	6/17/96	21
23	Document Revision	2d	6/17/96	6/19/96	22
24	Transmit Draft to DOE	1d	6/19/96	6/20/96	19,23
25	Transmit to agencies	1d	6/20/96	6/21/96	24
26	Agency Review	.5d	6/24/96	7/2/96	25
27	Prepare for Round Table	6d	6/20/96	7/2/96	24
28	Submit Revised Appendices	0d	7/2/96	7/2/96	27
29	Round Table Review of Controversial Sections (2&3) with K-	0d	7/2/96	7/2/96	28
30	Incorporate or Resolve Round Table Comments	6d	7/3/96	7/11/96	29
31	Interact with Commenters to Resolve Comments	6d	7/3/96	7/11/96	29
32	Prepare Transmittal Cover Letter	1d	7/11/96	7/12/96	30
33	Transmit Draft Final IGD to K-H	1d	7/12/96	7/15/96	32
34	Deliver Draft IGD to K-H	0d	7/15/96	7/15/96	33,32
35	Final Draft IGD	31.44d	7/16/96	9/3/96	34
36	Formal Review of Draft IGD by K-H, DOE, CDPHE, and EPA	10d	7/16/96	7/31/96	34
37	Receive Comments on Draft IGD	5d	7/31/96	8/7/96	36
38	Incorporate or Resolve Comments on Draft IGD	15d	8/7/96	8/30/96	37
39	Interact with Commenters from all Organizations to Resolve	15d	8/7/96	8/30/96	37
40	Prepare Transmittal Cover Letters for Final Draft IGD	7.22d	8/20/96	8/30/96	38FF
41	Deliver Completed Final Draft Sections for Transmittal	2d	8/30/96	9/3/96	40
42	Deliver Final Draft IGD to K-H	0d	9/3/96	9/3/96	41,40
43	Final IGD	19d	9/3/96	10/2/96	
44	RFCA Parties Sign IGD	5d	9/3/96	9/10/96	42
45	Prepare Copies of IGD	4d	9/11/96	9/17/96	44
46	Distribute Copies of IGD	10d	9/17/96	10/2/96	45
47	Project Complete	0d	10/2/96	10/2/96	46
48	Scheduled IGD Signature Date	0d	9/10/96	9/10/96	44
49	IGD Signature Target Date	0d	8/30/96	8/30/96	



Project: IGD Buddy Revision
Date: 6/11/96 8:01 am

Critical
Noncritical
Progress
Milestone
Summary
Rolled Up

2

RF/ER-96-0030.UN

Draft RFCA Implementation Guidance Document

June 1996

3

Draft RFCA Implementation Guidance Document

Rocky Mountain Remediation Services, L.L.C.

Environmental Restoration/
Waste Management Sitewide Actions

June 1996

4

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ACRONYMS, ABBREVIATIONS, AND INITIALISMS

ALARA	as low as reasonably achievable
ALF	action level and standards framework
AOC	area of concern
AR	Administrative Record
ARAR	Applicable or Relevant and Appropriate Requirement
ASAP	Accelerated Site Action Plan
BRA	Baseline Risk Assessments
C/ED	DOE Office of Communication and Economic Development
CAD/ROD	Corrective Action Decision/Record of Decision
CDPHE	Colorado Department of Public Health and Environment
CHWA	Colorado Hazardous Waste Act
CMS/FS	Corrective Measure Study/Feasibility Studies
D&D	Decontamination and Decommissioning
DNFSB	The Defense Nuclear Facility Safety Board
DOE	The Department of Energy
DOP	Decommissioning Operations Plan
DPP	Decommissioning Program Plan
DQO	Data Quality Objective
DRC	Dispute Resolution Committee
EE/CA	Engineering Evaluation/Cost Assessment
EPA	Environmental Protection Agency
ERA	Ecological Risk Assessment
ERAM	ecological risk assessment methodology
FFCA	The Federal Facility Compliance Act
FSP	Field Sampling Plan
FY	fiscal year
HASP	Health and Safety Plan
HRR	Historical Release Report
HWIR	Hazardous Waste Identification Rule
IA	industrial area
IAG	Interagency Agreement
IGD	Implementation Guidance Document
IHSS	Individual Hazardous Substance Sites
IM/IRA	Interim Measure/Interim Remedial Action
ISB	Integrated Site Baseline
MAL	Master Activity List
MCL	Maximum Contaminant Level
MCS	Management Control System
NA	No Action
NCP	National Contingency Plan
NEPA	National Environmental Policy Act
NFA	No Further Action
NPDES	National Pollution Discharge Elimination System
NPL	National Priorities List
OU	Operable Unit
PAC	Potential Areas of Concern
PAM	Proposed Action Memoranda
PCB	Polychlorinated Biphenyl
PPRG	Programmatic Preliminary Remediation Goal
QAPjP	Quality Assurance Project Plan
RBI	risk based concentration
RCRA	Resource Conservation and Recovery Act
RFCA	Rocky Flats Clean Up Agreement
RFETS	Rocky Flats Environmental Technology Site

RFFO	Rocky Flats Field Office
RFI/RI	RCRA Facility Investigation/Remedial Investigation
RSOP	RFCA Standard Operating Procedures
SAP	Sampling and Analysis Plan
SEC	Senior Executive Committee
SEDRC	State-EPA Dispute Resolution Committee
SESEC	State-EPA Senior Executive Committee
SNM	special nuclear material
TM	Technical Memoranda
UTL	upper tolerance level

1.0 INTRODUCTION

1.1 SCOPE AND PURPOSE OF ROCKY FLATS CLEAN UP AGREEMENT (RFCA) IMPLEMENTATION GUIDANCE DOCUMENT (IGD)

The RFCA is an instrument that describes the regulatory framework for performing Environmental Restoration (ER) and deactivation and decommissioning (D&D) activities at the Rocky Flats Environmental Technology Site (RFETS). RFCA replaces the 1991 Interagency Agreement (IAG). The signatory parties to RFCA are the Department of Energy (DOE), the Environmental Protection Agency (EPA) Region VIII, and the Colorado Department of Public Health and Environment (CDPHE). The RFCA provides for the preparation of an IGD. The IGD is a tool that the parties to the RFCA will use to guide the planning, the decisions, and the implementation of deactivation, decommissioning, and environmental remedial action at the RFETS.

The IGD is intended to contain information on:

- Technical approach
- Content of specific decision documents
- Implementation of accelerated actions
- Risk assessment

In addition, an objective of the IGD is to allow the to use the same basis approach regardless of whether the work is related to the industrial area (IA) or the buffer zone.

1.2 ORGANIZATIONAL AND FUNCTIONAL RESPONSIBILITIES

The RFCA obligates each party to prepare a written description of its internal organization to be included in the IGD. Each party must designate one or more individuals to perform the functions of project coordinator. This designation may be changed by written notification to the other parties. In addition, each party must also specify one or more points of contact for sending, receiving, and distributing correspondence.

The following sections provide the required written description for each party to RFCA, at the effective date of RFCA. Updates will be incorporated on an as-needed basis.

1.2.1 CDPHE Internal Organization and Project Coordinators

(reserved)

1.2.2 DOE Internal Organization and Project Coordinators

(reserved)

1.2.3 EPA Internal Organization and Project Coordinators

(reserved)

1.3 ENFORCEABILITY OF RFCA, ATTACHMENTS, APPENDICES, AND IGD

Resource Conservation and Recovery Act (RCRA) permits, Air Quality permits, and National Pollution Discharge Elimination System (NPDES) permits are clearly outside of RFCA jurisdiction. RFCA does control:

- Remedial activities for Individual Hazardous Substance Sites (IHSSs)
- Decommissioning
- Mixed wastes not covered by the present Federal Facility Compliance Agreement (FFCA)
- Timely completion of milestones
- Closure of underground storage tanks

Within this realm, RFCA defines a hierarchy of documents with distinct legal enforceability. The preamble to RFCA, the IGD, and the RFCA Appendices are not enforceable. Conversely, the body of the RFCA and its attachments are enforceable.

Consistent with the title, the "IGD" is not binding on DOE, CDPHE or EPA, but the IGD will be used by the parties for reviewing the adequacy of documents and of work submitted by DOE.

1.4 OVERVIEW OF THE IGD

The IGD consists of five major sections:

1. Introduction
2. Integration
3. Technical Approach and Procedures
4. Administration
5. Public Involvement/Stakeholder Support

In Section 1, the Introduction discusses the scope and purpose of the IGD; the organizational and functional responsibilities of each party; and the enforceability of the IGD. The RFCA's impact on the integration of requirements and programs is discussed in Section 2. Section 3 provides technical and procedural detail related to the basis decision tools embodied in RFCA. In addition, Section 3 discusses technical aspects of other supporting activities that are necessary components of the combined RCRA Corrective Action/Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process. Examples include risk assessment and Applicable or Relevant and Appropriate Requirement (ARAR) analysis. Section 4 focuses on planning, budgeting, and administration of RFCA/CERCLA recordkeeping obligations. Processes to promote community involvement are presented in Section 5. A glossary in provided as an appendix for reference purposes.

2.0 INTEGRATION

2.1 INTEGRATION OF REQUIREMENTS

Regulatory and oversight authority discussed in RFCA addresses three entities: The Defense Nuclear Facility Safety Board (DNFSB), the CDPHE, and the EPA Region VIII. These entities have reached an agreement on their responsibilities for each activity leading to site closure.

The DNFSB has primary responsibility for operations, processing, storage, onsite transport, deactivation, and decommissioning for low level radioactive waste and special nuclear materials (SNM) that are not waste. The CDPHE has primary responsibility for RCRA/Colorado Hazardous Waste Act (CHWA) regulated activities (i.e., RCRA permit) and decommissioning facilities and environmental restoration occurring in the IA. EPA has primary responsibility for environmental restoration in the buffer zone and remedy selection under CERCLA.

The RFCA also provides integration of oversight authorities and regulatory requirements. Activities that are not subject to RFCA continue to be subject to the appropriate permits, orders, and so forth as discussed in RFCA ¶65. Examples include the Site RCRA/CHWA permit (CERCLA permit waivers apply to certain phases of the RFETS cleanup mission, as agreed to in RFCA paragraph 16); the mixed residue compliance order; the Federal Facility Compliance Act (FFCA) Site Treatment Plan and order; the Site Air Quality Operating Permit (when issued); and the Site NPDES permit.

The National Environmental Policy Act (NEPA) process must be followed for proposed actions at the Site. A NEPA Checklist is prepared to initiate the NEPA process. Where the action is regulated under CERCLA, and NEPA values are addressed, the CERCLA process is equivalent to the NEPA process and no further documentation needs to be prepared. Whether the RCRA process is equivalent to NEPA depends upon the nature of the activity. The Site must consult DOE-Headquarters for a RCRA/NEPA determination (DOE Policy ref: DOE O 451.1 and Secretarial Policy Regarding National Environmental Policy Act Compliance, June, 1994).

Certain other standards are integrated into the RFCA activities. FFCA requires that the Site meet RCRA land disposal restrictions requirements for stored waste unless other agreements or permit waivers are in place. For further discussion, see the IGD Section 3.3. DOE Orders and other DOE requirements will be incorporated through the site Authorization Basis Process and other standard site procedures in effect at the time of the action.

Three other components, when combined with RFCA, serve to integrate and provide overall direction at RFETS. At the highest level, the Site Vision is a non-enforceable statement of objectives that is intended to define how DOE and the regulators will oversee activities at the Site. Second, the Integrated Site Baseline (ISB) provides a forum to identify and coordinate projects within the framework of enforceable regulatory milestones. Finally, the Accelerated Site Action Plan (ASAP) is a planning and integration project with the goal of radically reducing the risks associated with the presence of nuclear and non-nuclear materials at RFETS.

RFCA, ¶ 97 states that "*accelerated actions including those that are done in lieu of closure plans, do not require separate CHWA permit modifications or permits. Instead, substantive CHWA requirements that are applicable to the proposed action, including any requirements for post-closure permits, will be addressed in the PAM, IM/IRA, or SOP*" (RSOP). The coordination between DOE and CDPHE on determining the need for permits triggered by a proposed remedial action,

streamlining and parallel development and approval of documents are described in ¶ 98 – ¶ 106 of RFCA.

2.2 INTEGRATION OF DEACTIVATION, DECOMMISSIONING, ENVIRONMENTAL REMEDIATION, AND WASTE MANAGEMENT (WM) OPERATIONS

Deactivation, decommissioning, and environmental restoration will be coordinated through the ISB and supporting documents as shown in Figure 2-1. Various parts of a larger facility may be in different phases of facility disposition at the same time, so deactivation, decommissioning, environmental remediation, and WM will overlap to a great extent. As work is planned for each activity, projected waste volumes will be determined and waste management plans will be generated.

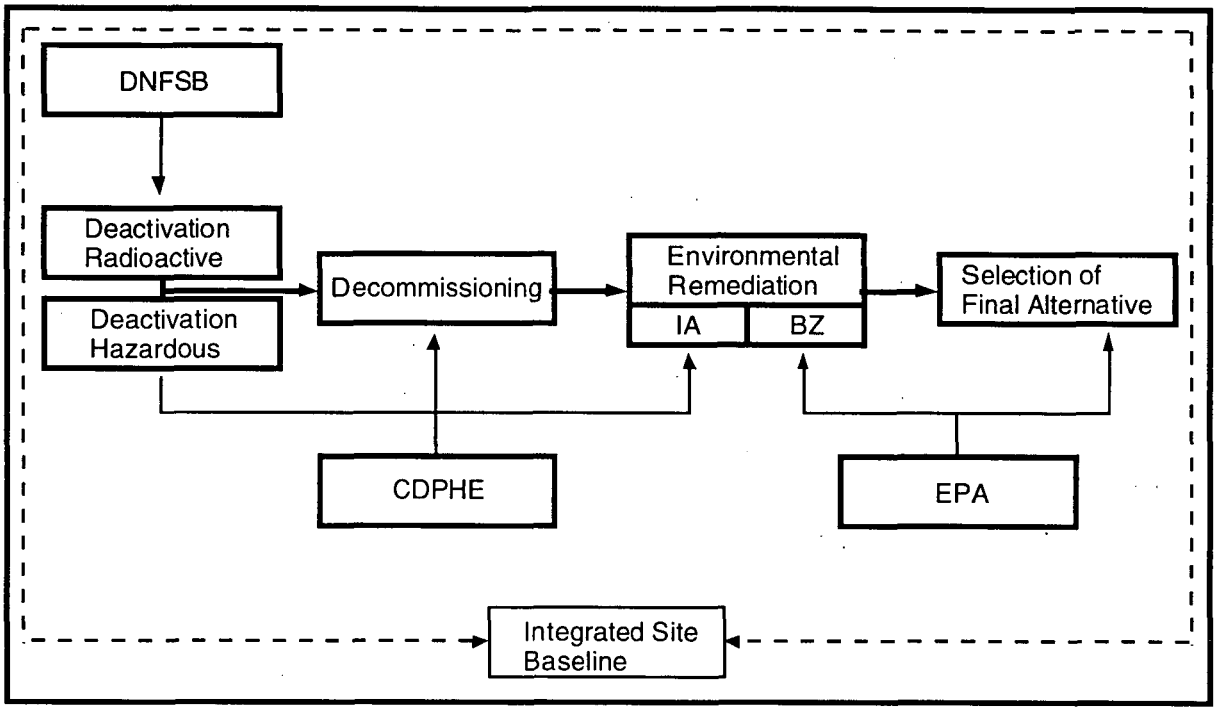

Figure 2-1 Primary Oversight and Facility Disposition Flow

Deactivation is overseen by the DNFSB (for activities involving radioactive-only material) and CDPHE (for RCRA wastes and CERCLA/RCRA materials in the environment). Deactivation provides the bridge between operations and decommissioning, and will target a building end-state in which the facility is safe and stable, and non-fixed contamination is removed. RCRA closures will be accomplished to the extent they are consistent with deactivation goals. In many instances, deactivation will place RCRA units in a RCRA stable condition for final disposition during decommissioning and environmental restoration.

Decommissioning is overseen by CDPHE under CERCLA removal authority, and includes decontamination of dismantlement and demolition. Decommissioning will receive the stable facility from deactivation and target an end-state in which the facility is retired from service to unrestricted, or restricted use as appropriate. If RCRA Regulated Units are present in the facility, RCRA closures may also be performed during this phase. The waste generated by decommissioning that is subject to RCRA is by definition, remediation waste and will be disposed during decommissioning or stored until a final management alternative disposal is determined.

Environmental Restoration receives the decommissioned facility and, based on the RFCA action levels, places the area in its final condition. Environmental Restoration will emphasize early, accelerated actions followed by risk assessment, and where appropriate, final action. Any ongoing surveillance and monitoring or maintenance established in decommissioning will be continued and modified as the remediation progresses.

3.0 TECHNICAL APPROACH AND PROCEDURES

To expedite remedial work and maximize accelerated risk reduction, the Site will make extensive use of accelerated actions at Individual Hazardous Substance Sites (IHSSs) and Potential Areas of Concern (PACs). For ease of discussion, "IHSSs" and "PACS" will all be termed as "IHSSs" for the remainder of this document.

The focus of the RFETS Environmental Restoration Program will be on clean up. Close-out documentation will be developed using a bias for action that (1) identifies IHSSs or evaluates the site for risk, (2) determines whether a clean up is necessary, and if so, (3) evaluates whether the IHSS is appropriate for an accelerated action, and (4) ranks the area relative to the other IHSS. Environmental restoration project flow is shown in Figure 3-1.

Following completion of all accelerated action and decommissioning, the residual risks in the IA and the buffer zone will be evaluated through interpretation and incorporation of available data into two respective RCRA Facility Investigation/Remedial Investigation (RFI/RI) documents which will include the Baseline Risk Assessments (BRAs). Based on results of the BRA, the need for a final remedial action and remedy selection will be determined. The selected remedy (if needed) will be described in a proposed plan and documented in a Corrective Action Decision/Record of Decision (CAD/RODs). Following implementation of the final remedy, or closure through an No Action/No Further Action No Further Remedial Action (NFA), CAD/ROD, a National Priorities List (NPL) delisting petition will be submitted as described in Section 3.10.

This section describes the processes and documentation steps to get an IHSS through the cleanup process, to closure in a CAD/ROD, and through the NPL delisting process.

3.1 PROCESS/STRUCTURE

RFETS was originally divided into 16 operable units (OUs) in the Rocky Flats Interagency Agreement (IAG). Attachment 1 to RFCA and a prior modification to the IAG consolidated the 16 OUs into the OUs listed in Table 3-1.

Development of RFETS-specific documents is described with accompanying flow charts in the following sections. Development of standard CERCLA documents will be in accordance with the National Contingency Plan (NCP) and other available EPA guidance documents.

In developing any RFETS decision document the DOE will meet with the regulators to present the conceptual approach to a given IHSS or remedial action. Once the remedial approach is agreed to by all parties, development of the decision document will proceed as outlined below.

The RFCA identifies five types of decision documents:

1. IM/IRAs will be developed when a formal evaluation of remedial options is necessary and remedial activities are estimated to require more than six months from commencement of physical work to completion. Requirements for IM/IRAs are discussed in Section 3.1.1 and Appendix A.

2. Proposed Action Memoranda (PAMs) will be used where remedy selection is straightforward, and remedial activities are estimated to take less than 6 months from commencement of the

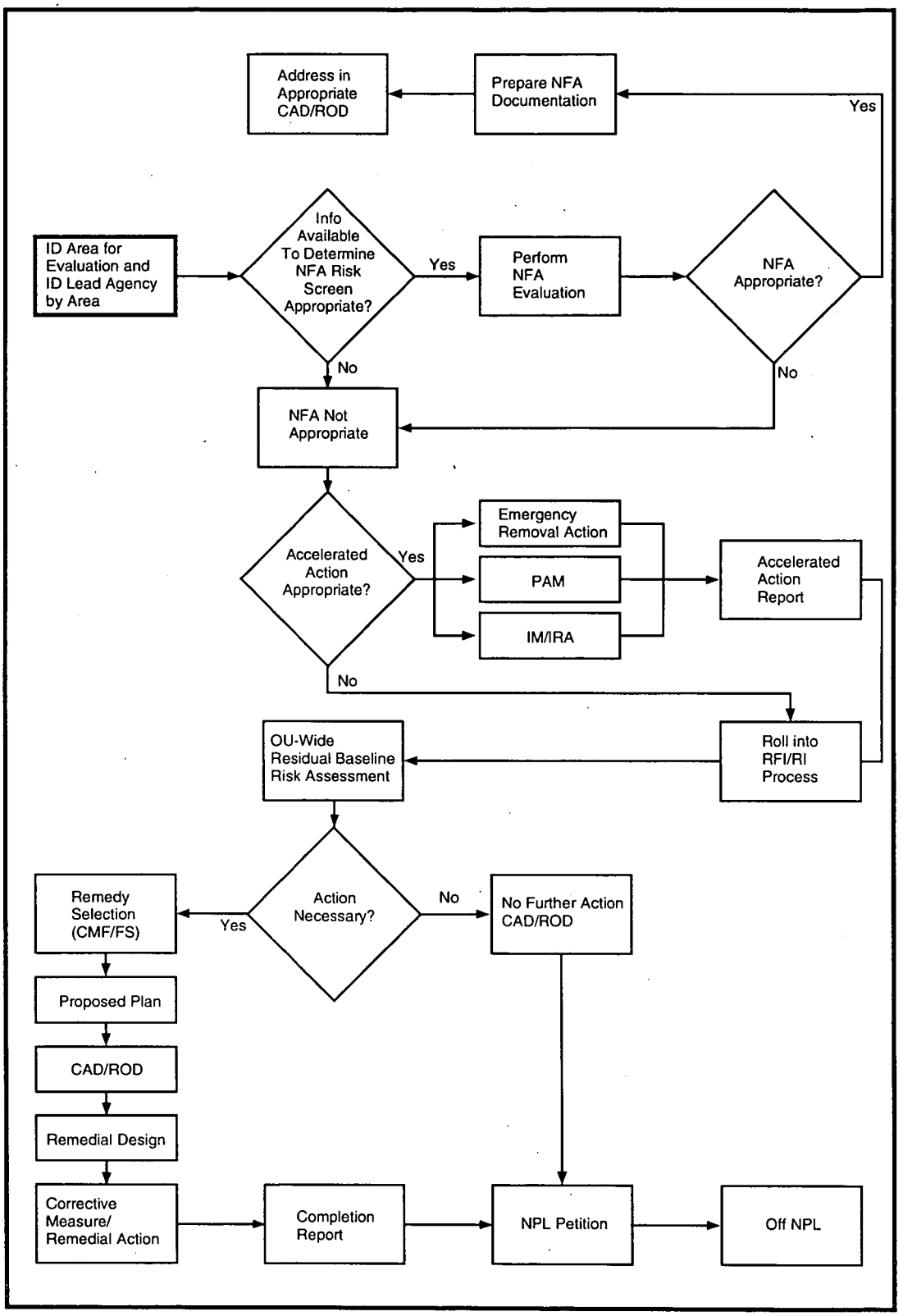

Figure 3-1 Environmental Restoration Process Flow

physical work to completion. Requirements for PAMs are described in Section 3.1.2 and Appendix B.

3. No Action/No Further Action (NA/NFA) decisions for IHSSs will be documented in updates to the Historical Release Report, as described in Section 3.1.3 and detailed in Attachment 6 to RFCA.

4. Corrective Action Decision/Record of Decisions (CAD/RODs) will be developed to document the final corrective action/remedial decision for the buffer zone and the industrial area (IA). Development of CAD/RODs will follow EPA guidance. The RFCA approach to CAD/RODs is described in Section 3.1.4.

5. The RFCA also identifies RFCA Standard Operating Procedures (RSOPs) that represent PAM-like decisions on remedial methods/actions that will be performed on a repeat basis. RSOPs require only agency notification as public involvement is addressed during the initial decision-making process. Requirements for RSOPs are addressed in Section 3.1.5. RSOPs will also be used for decontamination and decommissioning (D&D) actions.

Table 3-1 Proposed Operable Unit Consolidation at RFETS

Proposed OU	Consisting of	Lead Reg Agency	Status
OU 1	Current OU 1 IHSS	EPA	Closure using ROD process in progress.
OU 7	Current OU 7 IHSSs	EPA	Submit IM/IRA & proposed plan concurrently.
OU 3	Current OU 3 IHSSs	EPA	Closure using ROD process in progress.
Industrial Area OU	All IHSSs from OUs 4, 8, 9, 12, 13, 14, the original landfill (OU 5 IHSSs 115 & 196), the Triangle Area, Old Outfall, and Sludge Dispersal Area (OU 6 IHSSs 165, 143, & 141 & all OU 10 IHSSs except those in PU&D Yard – IHSSs 170, 174a, & 174b).	CDPHE	Data summaries will be addressed by early actions & ASAP presumptive remedy, all IHSSs rolled into Final ROD.
Buffer Zone OU	All IHSSs from OU 2, the PU&D Yard from OU 10, & all IHSSs from OUs 5 & 6, except those listed above.	EPA	Individual IHSSs cleaned up as early actions based on risk, all IHSSs rolled into Final ROD.

Other supporting documents identified in RFCA, or necessary to get an IHSS to the decision document stage, are RCRA Facility Investigation/Remedial Investigation (RFI/RI) work plans and reports, and Corrective Measure Study/Feasibility Studies (CMS/FSs), all of which are part of the RFI/RI CAD/ROD process. Sampling and Analysis Plans (SAPs), Technical Memoranda (TM), and Emergency-Action Reports may also be used if necessary.

Appendices are included that discuss the development of RFETS-specific documents. When documents will be developed using the standard CERCLA approach, the EPA guidance for developing these documents is cited.

Document Review

This section describes the generic decision document review process for accelerated actions. Appendix I provides generic schedule for preparation and review of each document type. DOE will issue a draft decision document to the Lead Regulatory Agency (LRA) for approval before release to the public. After incorporating comments and receiving agency approval, DOE shall make the proposed Decision Document available for public comment for 30 calendar days. At the conclusion of the public comment period, DOE shall have 14 calendar days to incorporate public comments, as appropriate, and prepare a Responsiveness Summary. DOE will then submit the revised Decision Document and Responsiveness Summary to the LRA. The LRA will have 7 calendar days to approve or disapprove the Decision Document and the Responsiveness Summary, provide comments, or request an extension of a specific duration. DOE will then have 7 calendar days to incorporate the agencies' comments or, if concerns cannot be resolved, invoke dispute resolution. If the LRA believes that significant changes have occurred to the Decision Document as a result of regulator input, the State or EPA may require an additional public comment period. All parties agree that emphasis shall be placed on project planning/scoping at the staff level to minimize the probability of this occurring. If the LRA does not respond within the initial review period or by the end of the requested extension period, the final document and Responsiveness Summary are automatically approved.

During the public comment period and after consultation with, and approval by LRA, DOE may initiate certain preliminary activities. These preliminary activities may include conducting appropriate sampling in accordance with the approved SAP and conducting any studies and administrative activities prerequisite to implementing the early action.

If public comments are received, the approved Responsiveness Summary will be placed in public information repositories at least 10 calendar days before the early action is initiated, except with regard to the approved preliminary activities described above. DOE shall keep the LRA apprised of the progress of the activities required for implementation of the early action through inclusion in the monthly project coordinators meeting, and the quarterly progress reports as per paragraph 251 of the RFCA.

A Completion Report shall be prepared for each action when all work is completed and analytical data are validated. The report will consist of a brief description of the work that was completed, including any variations from the original Decision Document, and any analytical results, including the results of any confirmatory sampling taken to verify completion of the action to the specific performance standards.

3.1.1 Interim Measure/Interim Remedial Action (IM/IRA) Decision Documents

IM/IRAs apply to interim remedial activities that are estimated to take more than 6 months from the commencement of physical work to completion (RFCA ¶ 95). IM/IRAs will be developed for accelerated actions where several remedial options are available. It is anticipated that most accelerated actions will be performed through Proposed Action Memoranda (PAMs).

The IM/IRA should be as concise as possible. The length of the document depends on the complexity of the action. It must include sufficient information to describe the action, to measure adequate performance, and to identify the criteria for completion of the action. It establishes the requirements for the work and documents the decision and its justifications.

Project Scoping

Before the development of the IM/IRA, a scoping meeting will be held between EPA, the State, and DOE to coordinate the RFCA requirements. Consistent with the RFCA, the lead agency will be based upon the location of the IHSS. The purpose of the meeting is to discuss the regulatory requirements and to agree on the scope of the action and the content of the IM/IRA Decision Document and the need for permits for each situation. At the meeting, the LRA will inform DOE of the specific performance standards to be addressed within the decision document. Performance standards are generally expected to be based on the RFCA action level and standards framework (ALF).

Sampling and Analysis Plan

Following concurrence on the objectives of the IM/IRA, DOE, in consultation with the LRA will determine if a SAP is required. The need for a SAP will be based on requirements necessary to perform the action or confirm that the action has been completed. Development of SAPs is described in Section 3.1.10 and Appendix C.

To reduce approval time and effectively use resources, every effort shall be made to use pre-existing or generic quality assurance plans for the SAP. Depending on the nature of the action, the SAP need not be more than a few pages long. The SAP may incorporate by reference the quality assurance plans/field sampling plans (FSPs) from similar, previously approved RFI/RI work plans or decision documents.

IM/IRA Format

IM/IRA format and contents are discussed in Appendix A, Preparation of an IM/IRA. The Engineering Evaluation/Cost Assessment (EE/CA) process is one method of performing a streamlined alternatives development and screening, and can be employed in preparation of IM/IRAs as necessary. A discussion of the EE/CA process can be found in *EPA Guidance on Conducting Non-Time Critical Removal Actions Under CERCLA* (EPA, August 1993). The EE/CA process should be the upper bound of complexity for the IM/IRA document. The documentation of the EE/CA process, if used, will be incorporated in the decision document, and subject to public comment and agency approval as part of that submittal. Figure 3-2 illustrates the IM/IRA process. The IM/IRA schedule will closely follow the document review process outlined in Section 3.1 and is included in Appendix I.

3.1.2 PAM

An accelerated response action is an environmental activity to mitigate a threat or potential threat to public health or the environment that can be completed within six months. The PAM is the primary planning and implementation document for accelerated response actions. The purpose of the PAM is to describe the nature of the contamination, the proposed mitigating action, and an implementation schedule. The PAM preparation process is summarized in Figure 3-3. Details of PAM preparation are found in Appendix B. Project scoping and the need for SAPs will be performed as described above. The schedule for developing a PAM will closely follow the document review schedule outlined in Section 3.1 and is included in Appendix I.

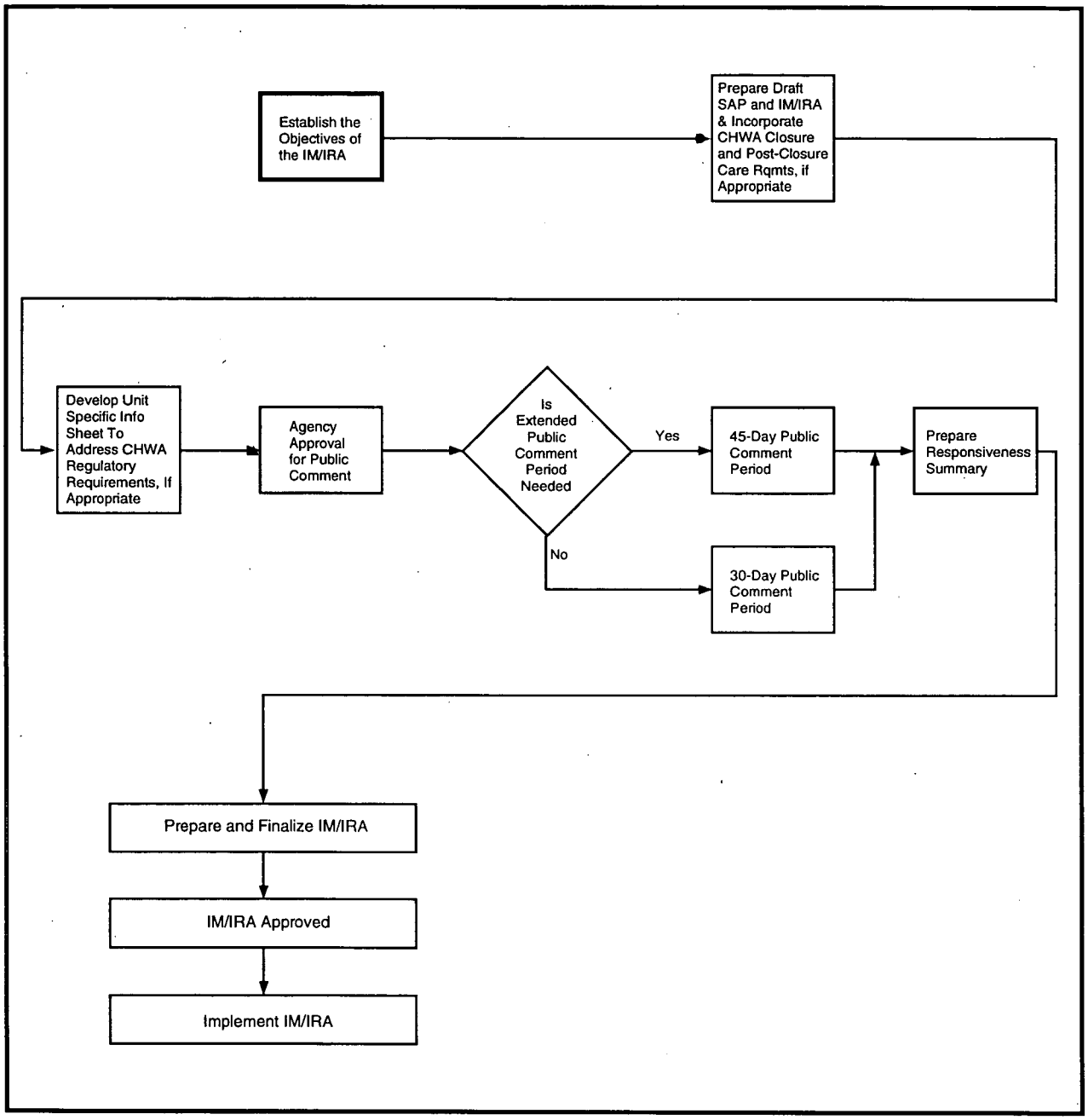

Figure 3-2 Interim Measures/Interim Remedial Action (IM/IRA) Process

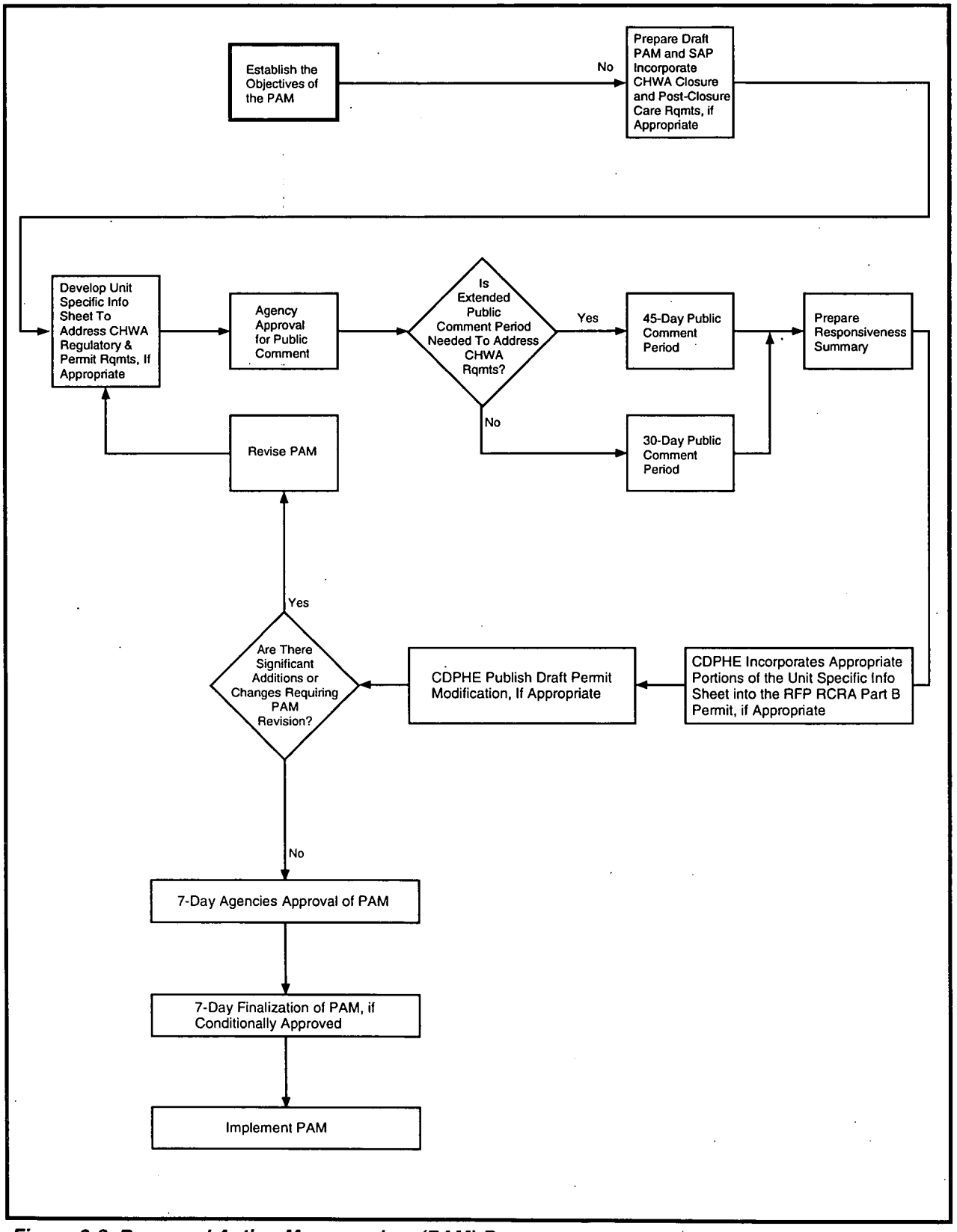

Figure 3-3 Proposed Action Memorandum (PAM) Process

3.1.3 NFA Decisions

The criteria for determining if a geographic area (IHSS, Source Area, OU, or Area of Concern) can be recommended for No Action, No Further Action, or No Further Remedial Action are detailed in RFCA Attachment 6. Also included in RFCA Attachment 6 are the NFA documentation requirements. The NFA decision process presented within RFCA Attachment 6 meets the substantive requirements to support an NFA (as defined by CERCLA) remedy selection for a CAD/ROD. An NFA decision may be warranted at RFETS under three sets of circumstances:

1. When the site or area of the site (e.g., an OU or an IHSS) poses no current or potential threat to human health or the environment (a no action decision); or

2. When a previous response eliminated the need for further remedial response (a no further action decision); or

3. When risk estimates based on specific exposure scenarios indicate that institutional controls alone will constitute acceptable risk management (a no further remedial action decision).

Various processes were consolidated in RFCA Attachment 6 to provide decision criteria for establishing those geographic areas at RFETS that do not require further study or remediation as part of the CERCLA process. The steps, in order of performance, are shown in Figure 3-4 and summarized below.

1. **Conduct source evaluation (with available data/information)**—If a review of historical release information/defensible data reveals that no current or potential source can be found, then the exposure pathway is incomplete and the IHSS will be documented for No Action.

2. **Conduct a background comparison**—If a review of historical release information/defensible data indicates that a current or potential threat may be present, an IHSS will undergo a background comparison. A background comparison is performed to distinguish between constituents that are associated with site activities and those associated with background conditions. If media-specific environmental data collected from an IHSS are shown to be at or below background levels for inorganic chemicals, and no organic chemicals are detected in that media, that IHSS will be documented for No Action.

3. **Conduct a CDPHE conservative screen**—The purpose of conducting a CDPHE conservative screen is to reduce the number of IHSSs that are required to undergo a CERCLA baseline risk assessment. Certain geographical areas have already been screened using the CDPHE conservative screen to evaluate human health risks. Ecological risks are screened using Tier 2 of the Ecological Risk Assessment (ERA) process. If an IHSS or source area passes the human health and ecological risk based screens, then that IHSS will be documented for No Action.

4. **Perform a Baseline Risk Assessment (BRA)**—The BRA consists of a human health risk assessment (conducted on an exposure area) and an ecological risk assessment (conducted an a site-specific drainage area). Only Two BRAs are anticipated, one for the residual contamination in the buffer zone, and one for the IA following implementation of the ASAP presumptive remedy. A BRA includes an evaluation of baseline conditions as if no action, including implementing institutional controls, were taken. Risks will be evaluated according to the land uses described in RFCA. If the results of the BRA show that the risks to human

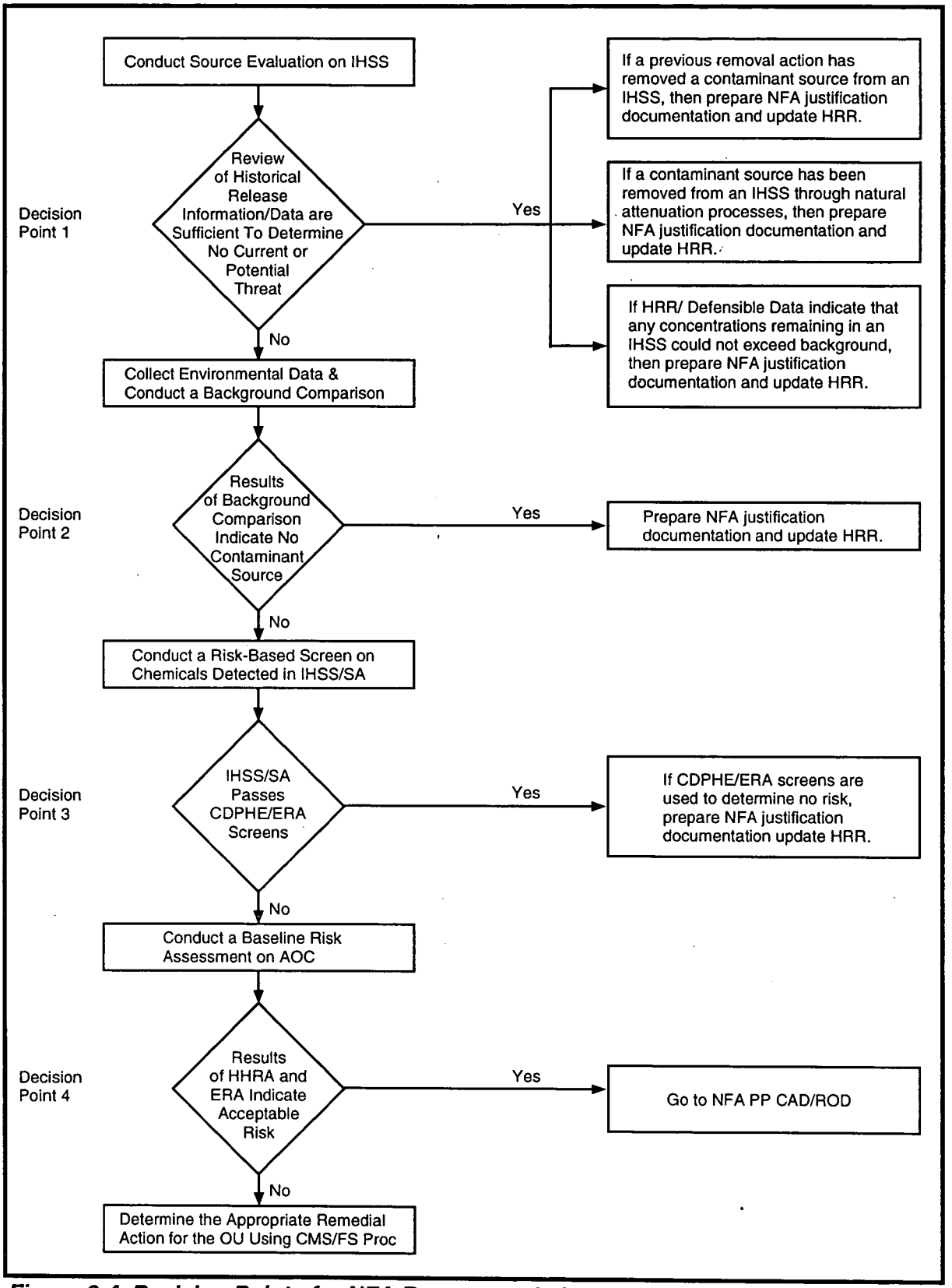

Figure 3-4 Decision Points for NFA Recommendations

health and the environment are within acceptable levels, the OU will be closed with a No Action or No Further Remedial Action CAD/ROD.

Administrative requirements for coordination of NFA decisions with the CAD/ROD process and with RCRA closures at RFETS also discussed in RFCA Attachment 6. The remedy selection process must be documented to support an NFA decision. For those sites evaluated within a Letter Report (i.e., a report generated as part of the CDPHE conservative screen), additional documentation justifying the NFA decision is not necessary; the Letter Report serves as the documentation. Rationale for an NFA decision will be summarized in an update to the Historical Release Report (HRR), and appropriate supportive documentation will be appended, as necessary (see Section 3.7). The HRR update for an NFA recommendation is intended to be a place keeper for documentation that the substantive requirements for an NFA decision have been met. Several geographic areas have undergone the NFA screening and the results will be documented in the 1996 HRR update.

Geographic areas that can only achieve No Further Remedial Action status if an institutional control is in place will be recognized as such. An institutional control and a recommendation for No Further Remedial Action will likely be part of the final CAD/ROD for the OU. A generic schedule for the NFA process is included in Appendix I.

3.1.4 Proposed Plan(PP)/CAD/ROD

Only three areas will be subject to the PP/CAD/ROD process. One will include all of the buffer zone, one will include all of the IA, and one will address OU 3. The RFI/RI for OU 3 has been completed.

Individual sites will either be documented as NFA sites or will be cleaned up through accelerated actions based on ER ranking. The residual contaminant levels will be documented in the various Accelerated Action Reports.

The IA will be remediated under a presumptive remedy as described in the ASAP. ASAP is currently examining the feasibility of a partial cap of the IA, and is developing a series of white papers to document the conceptual cap design, the potential affects of the cap on the site residual risks, and on the sitewide groundwater flow regime.

For the IA, as discussed in ¶ 84 of RFCA, CDPHE shall make a recommendation to EPA whether to concur with DOE's proposed remedial decision for radionuclides and other hazardous substances that are not hazardous constituents. This remediation decision will be presented to the public in a PP, and finalized in a CAD/ROD. The CAD/ROD will be developed following the Interim Final Guidance for preparing Superfund Decision Documents (OSWER Directive 9355.3-02).

For the buffer zone, following all planned accelerated actions, the RI/RFI will evaluate the risk for residual contamination remaining after accelerated actions, and will determine the need for further remediation to be performed under the proposed plan CAD/ROD. The remediation decision will be presented to the public in a proposed plan, following the Interim Final Guidance for preparing Superfund Decision Documents (OSWER Directive 9355.3-02).

Proposed Plan

Preparation of the proposed plan is described in the EPA interim Final Guidance on Preparing Superfund Decision Documents OSWER Directive 9355.3-02, June 1989. The purpose of a is to facilitate public participation in the remedy selection process by:

- Identifying the preferred alternative for a remedial action at a site or OU and explaining the reasons for the preference;
- Describing other remedial options that were considered in detail in the RFI/RI and CMS/FS report;
- Soliciting public review and comment on all of the alternatives described; and
- Providing information on how the public can be involved in the remedy selection process.

A proposed plan is a public participation document and is expected to be widely read. Therefore, it should be written in a clear and concise manner using nontechnical language. In addition, it should direct the public to the RFI/RI CMS/FS reports as the primary source of detailed information on the remedial alternatives analyzed as well as other site-specific information.

For the OUs at RFETS, the proposed plan should list the IHSSs that have been closed under accelerated action, through D&D, and through the NFA process that will be included in the CAD/ROD for the OU. A table format is recommended for listing the IHSS or building, how it was closed, and each IHSS or building closure report.

A proposed plan should clearly state that the LRA and the DOE have identified a preferred alternative based on available information, but have not "selected" a remedy to implement. A proposed plan supports only preliminary decisions for an OU. It should not make definitive findings or declarative statements that would be difficult to revise later.

A proposed plan should emphasize that the preferred alternative is only an initial recommendation. It should clearly state that changes to or from the preferred alternative may be made, if public comments or additional data indicate that such a change would result in a more appropriate solution. The plan must also state that the final decision will be documented in the CAD/ROD after the DOE and the lead agency have taken into consideration all comments from the support agency and the public.

The EPA guidance on preparing decision documents describes statutory requirements for a PP, and suggests language for these sections. The guidance also includes a suggested outline and detailed suggestions for writing a PP, and describes how to address changes to the proposed plan following public comment. A specific appendix on development of a proposed plan is not included in the IGD because RFETS proposed plans are expected to generally follow the process outlined in the EPA guidance. Rather than repeat information already well developed and presented, the reader is referred to this guidance and to previous RFETS proposed plans.

CAD/ROD

The CAD/ROD documents the remedial action plan for an OU. It is prepared by DOE and the lead agency in consultation with the SRA. The CAD/ROD has the following purposes:

- Serves as a legal function in that it certifies that the remedy selection process was carried out in accordance with the requirements of RFCA, CERCLA, and, to the extent practicable, the NCP

- Is a technical document that outlines the engineering components and remediation goals of the selected remedy

- Is informational, providing the public with a consolidated source of information about the history, characteristics, and risks posed by the conditions at the site, as well as a summary of the cleanup alternatives considered, their evaluation, and the rationale behind the selected remedy.

The CAD/ROD consists of three basic components: (1) a Declaration, (2) a Decision Summary, and (3) a Responsiveness Summary.

The Declaration functions as an abstract for the key information contained in the CAD/ROD, and is the section of the CAD/ROD signed by the EPA regional administrator or assistant administrator, the CDPHE administrator, and DOE.

The Decision Summary provides an overview of the site characteristics, the alternatives evaluated, and the analysis of the remedial options. The Decision Summary also fulfills statutory requirements.

The Responsiveness Summary addresses public comments received on the PP, RFI/RI and CMS/FS report, and other information in the administrative record.

The EPA Guidance on Decision Documents includes section by section discussion of the components of a ROD. It is proposed that this guidance be followed in developing an RFETS CAD/ROD. The closure of RCRA units within the CAD/ROD can be integrated by inclusion of a discussion cross-referencing where these closure requirements are addressed in the CAD/ROD. Guidance on preparing a No Action ROD is also covered in the EPA guidance. Rather than repeat information already well developed and presented, the reader is referred to this guidance and to previous RFETS CAD/RODs for development of a CAD/ROD. Appendix I includes a generic CAD/ROD development schedule.

3.1.5 RFCA Standard Operating Procedures (RSOPs)

RFCA SOPs (RSOPs) as defined in RFCA as:

> *"approved procedures applicable to a set of routine activities regulated under this agreement that DOE may repeat without re-obtaining approval because of the substantially similar nature of the work to be done."*

RSOPs will be developed for remedial actions or decommissioning activities where the same approach will be applied to several different IHSSs or buildings. The decommissioning Program Plan (DPP) described in Section 3.1.12 is an example of an RSOP. As noted in Paragraph 95 of RFCA, RSOPs

may incorporate "Alternative Operating Scenarios" as provided in the Air Quality Control Commission's regulations to implement Colorado Air Pollution Prevention and Control Act requirements in lieu of individual construction permits. An example of an RSOP for environmental restoration would be a generic plan for cleaning and inerting tanks. The no further action (NFA) procedure for documenting that an IHSS does not merit further action is also an RSOP. Because units that will require a remedy selection/screening process will each have IHSS-specific issues, a generic IM/IRA-type RSOP will not be developed. Review and approval of RSOPs will follow the document review process outlined in Section 3.0. The public comment period for RSOPs will follow the IM/IRA process.

3.1.6 RFI/RI Process

Since Remedial Actions at RFETS have been combined into fewer OUs, the CERCLA (EPA RI Guidance Document, 1988) process for RI development will be followed for the buffer zone and IA OUs. A combination of the EPA guidance for RI workplans and the streamlined approach for environmental restoration (SAFER) approach described in the DOE guidance for performing RI/FSs should be used as appropriate to develop workplans. A flow diagram showing the steps for the RFI/RI process, as envisioned for RFETS, is shown in Figure 3-5.

When the RFI/RI for the buffer zone and the IA are developed, all identified IHSSs should have undergone screening, and been identified for an NFA recommendation or early action. The emphasis for RFETS RFI/RIs will be on integration of existing data, and only gathering new data where data gaps related to remediation are identified. Decision-making needs will be linked directly to data collection, in accordance with the SAFER approach.

The IA RFI/RI will be developed following decommissioning of the IA buildings, and performance of early actions where appropriate. A feasibility study for a presumptive remediation (i.e., capping portions of the IA) is currently being performed under the ASAP process. Therefore, the IA RFI/RI will incorporate data from accelerated actions and residual risks from areas not under the cap. The IA RFI/RI will focus on developing an IA conceptual model and BRA. Areas which have not undergone early action and are not under the ASAP cap will be evaluated for further data needs. The necessity for collection of additional data will be determined during project scoping and development of the RFI/RI work plan. If enough data are available to determine the risk from the IA, and further remediation is necessary to address the risk, then any additional data collected will address remediation selection and design needs.

The buffer zone RFI/RI process may not involve the gathering of new data, but will focus on developing an OU-wide conceptual model and on developing a BRA for the buffer zone as a whole. The buffer zone and associated residual risks should be well understood at that stage. The Project Coordinators should be able to make an early decision on the most likely remedy (basis for action). The RFI/RI will focus on probable conditions that will determine remedial actions. If additional action is needed as part of the final remedial action for the buffer zone, the remedy with be selected either through CMS/FS process or through application of a presumptive remedy. Appendix I includes a generic RI/FS process schedule.

3.1.7 Emergency Removal Actions

If a determination of emergency removal action is made, the site will proceed immediately to cleanup. If a determination of non-emergency action is made, the IHSS or area will be ranked and cleaned up as funding becomes available. A flow chart for emergency removal actions is shown in

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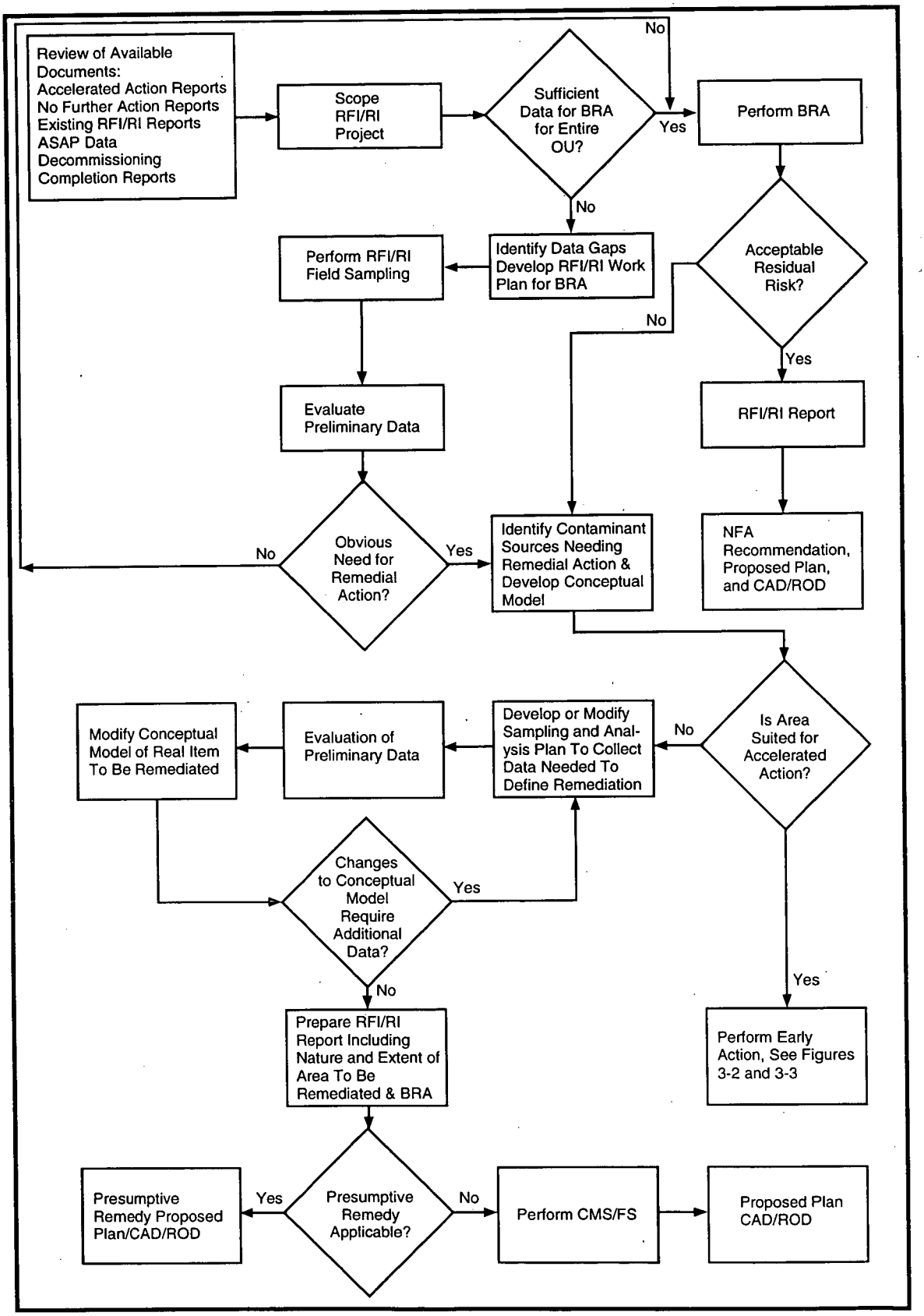

Figure 3-5 RFETS RFI/RI Process

Figure 3-6. EPA and CDPHE will be notified within 48 hours of discovering a condition requiring emergency removal actions and will be informed daily of the status of the removal action as it progresses. Emergency removal actions will be documented in a summary report that describes:

- Site
- Contaminants
- Nature of contamination
- Removal action
- Remaining contamination (if any)
- Waste generated and it's disposition

3.1.8 CMS/FS

Development of the CMS/FS, if needed, will be consistent with the NCP and EPA guidance. Preference will be for selection of an NFA decision or a presumptive remedy, if appropriate. No CMS/FS for the buffer zone is currently anticipated.

For the IA, a detailed feasibility study for a presumptive remedy is being performed under the ASAP process. Therefore, the IA RFI/RI will include all residual contamination in a residual risk assessment. The residual risk assessment will evaluate the completed early actions, and will assume the ASAP cap presumptive remedy will be in place. The RFI/RI and BRA will evaluate the area not included under the cap. A CMS/FS will be performed for the IA if the RFI/RI and BRA indicate the need for further action.

3.1.9 Technical Memoranda (TMs)

TMs will be written if necessary to resolve specific interpretive issues. These memos will not be part of the decision process or the standard IHSS closure process. The TM will address technical or regulatory issues for a specific project. They will be brief, similar in nature to a "white paper," and will be focused on presentation and discussion of information relevant to the specific issue. They will be developed to address or clarify issues, and will not be subject to the document review and revision process. Examples of TMs would be an examination of the design data needs for installing a passive hydraulic barrier system, an evaluation of the applicability of an applicable or relevant and appropriate requirement (ARAR) to a specific remedial action, or compilation and discussion of data to determine whether a constituent above ARAR or RFCA ALF cleanup levels is within natural background variability for the site. TMs will become part of the Administrative Record (AR).

3.1.10 Sampling And Analysis Plan (SAP) Preparation

SAPs are developed for any field sampling to be performed, including but not limited to RFI/RI field investigations, pre-design data collection, waste characterization, confirmation of treatment processes,

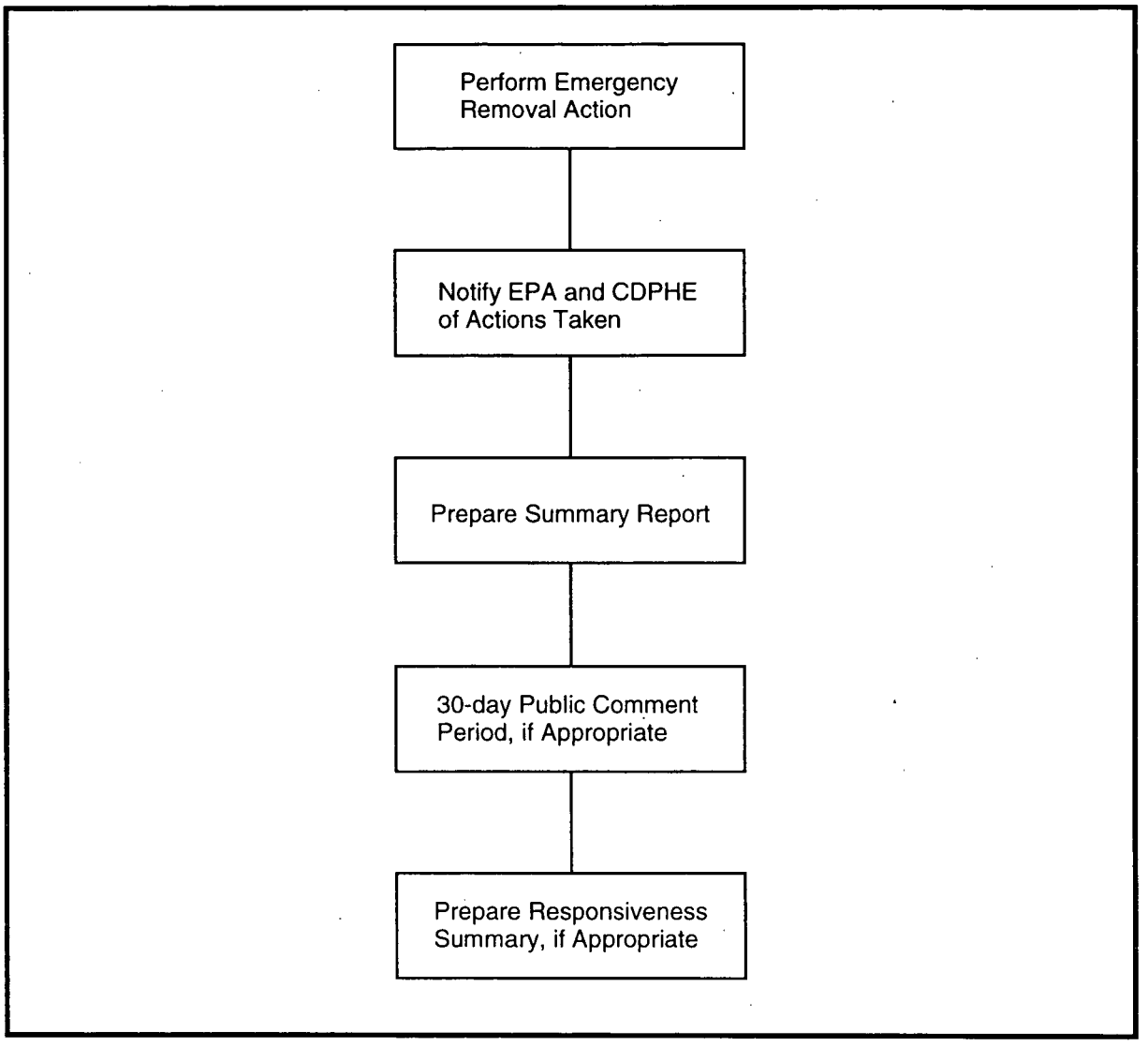

Figure 3-6 Emergency Removal Action

excavation control, and documentation of contaminants remaining after remediation. SAPs have three main purposes:

1. To document the decisions/uses for which data are needed, and the thought process used to determine the specific sampling approach.

2. To guide the field sampling crew in exactly what samples are to be collected, where and how they are to be collected, and what criteria trigger collection of additional or fewer samples.

3. To document for the field crew and the regulatory parties, the analytical methods to be used, and the specific requirements of sample collection and handling for those methods.

Sampling and analysis plans consist of a FSP and a Quality Assurance Project Plan (QAPjP). At RFETS, a sitewide QAPjP has been developed. Therefore, most SAPs consist of the FSP and discuss project-specific modifications to the QAPjP. Because of this approach, data quality objectives focused on the project-specific data needs are developed within each SAP/FSP. Development of SAPs is described in Appendix C.

3.1.11 RCRA Closure

All permitted units are subject to regulation under the RCRA Part B Permit, and will be closed consistent with the permit requirements. All interim status RCRA units are potentially subject to closure under the RFCA.

As discussed in ¶ 96 of the RFCA, interim status IHSSs regulated under RFCA may be closed either through a separate closure plan or through an accelerated action decision process. The 30-day public review/comment requirement for interim status closures will be met by the 30-day public comment period required for accelerated action decision documents unless performed under an IM/IRA or the action requires a permit. For RFCA units not cleaned up under accelerated actions, or as part of Deactivation and Decommissioning, the units will be closed as part of the final CAD/ROD. In addition, as required in Attachment 10 to RFCA, CDPHE and DOE will review the applicability of interim status to IHSSs within former OUs 9, 10, and 13.

The RFCA Attachment 10, Section I enumerates the requirements for closure of interim-status land-based units. This specifies a cap/cover over the land-based units, and specifies the design criteria to be used. These requirements will be incorporated into the decision document for the land-based units. Existing groundwater contamination will be addressed as determined by the ALF and spelled out in the sitewide Groundwater Conceptual Plan.

Minimum closure requirements for interim status, non land-based units are also enumerated in RFCA Attachment 10, Section II. Attachment 10 specifies decontamination and removal of regulated material from the units, and that any releases be addressed through remedial action as described in RFCA. These requirements will be incorporated into the appropriate PAM, RSOP, IM/IRA or CAD/ROD.

The general process that will be followed when an accelerated action is initiated at a unit subject to CHWA is summarized below.

- Where a determination is made that partial or complete closure of an entire interim status unit can be addressed by an accelerated action, the partial or complete closure requirements will

be incorporated into the accelerated action decision document. The decision document will have a section describing where the closure requirements are addressed within the document.

- Where a determination is made that partial closure of an entire interim status unit will not be addressed by the accelerated action, the accelerated action decision document will specify the partial closure requirements that will be deferred to a later action. For example, an accelerated action may be implemented to remove the source term from a tank system that has released contamination into the environment. In that case, the accelerated action decision document would identify the partial closure action to be addressed by the accelerated action (i.e., source term removal) and those actions that will be deferred to other actions. The need for permits will be addressed during project scoping as discussed in Section 3.1.1

3.1.12 Decommissioning Program Plan

The Decommissioning Program Plan (DPP) is an RSOP that establishes a decommissioning program at RFETS. The DPP will provide an approved baseline by which all lower-hazard decommissioning projects will be executed. The decommissioning will occur as part of the facility disposition process summarized in Figure 3-7 and detailed in the DPP. Decommissioning of facilities at RFETS will be performed under CERCLA removal authority. This policy encourages streamlined decommissioning by conducting the activities as "non-time critical removal actions" under CERCLA.

The Decommissioning Program will include characterization of the facilities; decontamination of the facilities; removal of contaminated equipment; dismantlement/demolition of structures; and release of the area for reuse by other DOE missions, commercial interests, or return to a greenfield status. Radioactive wastes will be condensed, stabilized, and confined to protect the public and the environment in a publicly acceptable manner.

Decommissioning will be preceded by a preliminary hazard analysis and the removal of special nuclear material (SNM) in its various forms, decontamination, and removal of equipment and system hold-up. This "deactivation" will provide a preliminary characterization and allow down-grading of security requirements for the facility. Remaining material inventory and occupational hazards will be incorporated into a building-specific HASP for decommissioning. A building Surveillance and Maintenance activity may also be required; surveillance and maintenance will continue as required through decommissioning and on into environmental restoration if appropriate.

Wherever possible, the closure of RCRA units will be included in deactivation and decommissioning. Tanks will generally be drained and flushed during deactivation and disposed during decommissioning. Some tanks which were originally included in the Interagency Agreement (IAG) of 1991 are specifically included in environmental remediation per RFCA Attachment 4. Soils areas, building slabs, and subfloor components such as sewers and drain lines will be closed after decommissioning by the environmental restoration program as described in RFCA Subpart B and Sections 3.0 through 3.1.11 of this IGD.

Environmental restoration activities will continue until the building site is placed in its final condition, any remaining, associated RCRA units are closed, all required regulatory documents are completed, and a final site survey is complete. Required surveillance and maintenance that was initiated during decommissioning will continue under environmental restoration and will be modified as work progresses. Any long-term surveillance, maintenance, and monitoring program will be established as part of the Final CAD/ROD document.

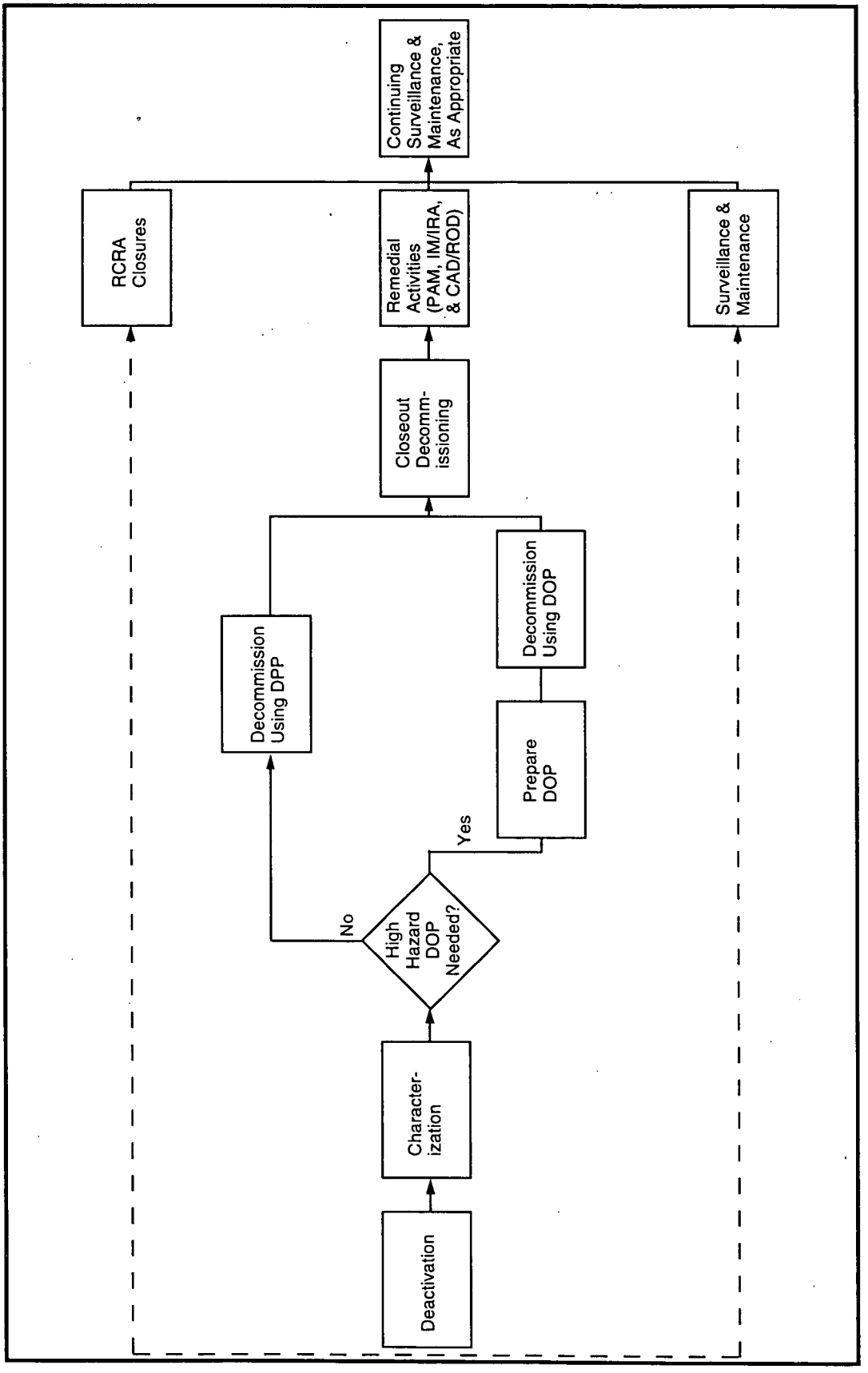

Figure 3-7 Facility Disposition Process

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Press Releases and Community Advisories—Media relations is the focal point for disseminating information to all media outlets and serves as a point of contact for all incoming queries from the media. The Site will periodically issue information about programs and projects to the news media in the form of a press release.

Community advisories (brief, one-page information alerts similar to fact sheets) relating to program and project activities, and associated public involvement opportunities will be distributed to municipalities, interested citizen groups, businesses, oversight groups, and regulatory agencies.

Media releases and community advisories are prepared by the Community Outreach Division with approvals from the DOE C/ED and project representatives.

Fact Sheet—Publication including detailed information about key Site activities on projects for dissemination to anyone upon request. Fact sheets are prepared by Kaiser-Hill Community Relations with approvals from the DOE C/ED and project representatives.

Community Mailing List—RFETS maintains a mailing list of more than 2000 individuals and organizations interested in receiving information about the Site. Items such as notices of public hearings, news releases, fact sheets, and community advisories, and so on, are generally sent to those on the mailing list.

Reading Rooms—Documents will be made available for public review at various locations throughout the Denver metropolitan area and upon request when possible. Generally, documents are those for which public comments are being accepted. Other draft project plans and information from other sites are available as well.

Public Tours—Tours and briefings specifically relating to any project will be available upon request. Specific project information will be included in the briefing or visit to relevant areas of the Site.

Speakers Bureau—Used to provide groups or interested parties with Site experts to speak on a variety of topics. Kaiser-Hill Community Relations coordinates this program.

6.0 REFERENCES

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DOE, 1995b, Programmatic Risk-Based Preliminary Remediation Goals, Final Revision 2, February.

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DOE, 1995e, *Ecological Risk Assessment Methodology: Ecological Chemicals of Concern* (Final Draft), Prepared for DOE Rocky Flats Field Office, by EG&G Rocky Flats, Inc., April.

EPA, 1987, *Data Quality Objectives for Remedial Response Activities – Development Process.*

EPA, 1988, *Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA*, 540, G-89, 004.

EPA, 1988, *CERCLA Compliance with Other Laws Manual: Interim Final.*

EPA, 1989, *Interim Final Guidance on Preparing Superfund Decision Documents: The Proposed Plan, The Record of Decision, Explanation of Significant Differences, and The Record of Decision Amendment*, OSER Directive 9355.3-02.

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EPA, 1994, *Ecological Guidance for Superfund: Process for Designing and Conducting Ecological Risk Assessments* (Review Draft), Environmental Response Team, Edison, NJ, September.

EPA/CDPHE 1995, Letter from Tim Rehder (EPA) and Joe Schefflin (CDPHE) to Steven W. Slaten (DOE), December 12.

Major Activity List, Revision 2, April 1996.

N96-ER-ADM-17.09, *Records Identification, Preliminary Preparation and Creation.*

Site Policy 2-27, *Administrative Record.*

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1-F78-ER-ARP.001, *CERCLA Administrative Record Program.*

1-R32-ADM-02.38, *Activity Definition Process*, Revision 0.

1-R97-F&A-MCS-001, *Management Control System.*

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2-G18-ER-ADM-17.01, *Records Capture and Transmittal.*

2-S65-ER-ADM-17.02, *Administrative Record Document Identification and Transmittal.*

3-21000-ADM, *ER Administrative Procedures Manual.*

Section 113(k) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986.

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Kaiser-Hill Community Relations will take the lead in planning and coordinating public outreach and involvement activities for an individual program or project. This will involve working with the project/program planners and technical representatives to ensure an appropriate level of outreach and involvement.

Once a public involvement approach has been agreed upon and approved by the DOE, the implementation will, in most cases, involve project/program staff. Project/program staff may be called upon to participate in any number of public involvement activities, such as briefings, public presentations, and workshop or focus group discussions. In addition, all informational materials will require project staff review and approval before release.

5.4 PUBLIC INVOLVEMENT PLAN

A public involvement plan, while not required for all projects, provides the framework from which public involvement activities are coordinated. Kaiser-Hill Community Relations will prepare the actual plan in consultation with project/program managers. The public involvement plan provides project/program managers with the necessary activities and information releases to meet the legal requirements for public participation.

The public involvement plan will vary depending on the project scope, impact, and public interest. However, the level of public involvement is determined primarily by the legal requirements and varies from project to project. The public involvement plan will outline the tools or activities proposed for the project by the Kaiser-Hill Community Relations department as a means of disseminating information and soliciting public involvement.

5.4.1 Public Involvement Tools

All activities for public involvement are designed to increase the public's level of understanding and enhance the communities role in decision-making. Many of the activities are based upon legal activities set forth in NEPA, CERCLA, RCRA, and RFCA.

Funding for the majority of these activities will come from the project budget, for example, advertisements, audio equipment, hearing transcripts, and in some cases meeting space rentals.

All of the following listed involvement tools are coordinated and arranged by Kaiser-Hill Community Relations.

Briefings/Presentations/Discussions—Provide easy access to information regarding specific projects, and their decision-making processes. Upon request, and to the extent possible, subject matter experts will conduct the briefings, presentations, and discussions to federal, state, and local officials; local governments; business groups; news media; schools; special interest groups; and individuals.

For the most part, briefings, presentations, and discussions will be conducted weekdays at a time of day conducive to the requester(s). Times could range from early morning (for discussions at schools, and business groups) to evening hours (civic and government meetings).

Public Hearings/Public Comment Opportunities—Provide a forum for interested parties to offer input to plans, activities, and decision-making processes. Public comment periods usually extend 60 days with the hearing falling between 30 – 45 days after the beginning of the comment period.

Press Releases and Community Advisories—Media relations is the focal point for disseminating information to all media outlets and serves as a point of contact for all incoming queries from the media. The Site will periodically issue information about programs and projects to the news media in the form of a press release.

Community advisories (brief, one-page information alerts similar to fact sheets) relating to program and project activities, and associated public involvement opportunities will be distributed to municipalities, interested citizen groups, businesses, oversight groups, and regulatory agencies.

Media releases and community advisories are prepared by the Community Outreach Division with approvals from the DOE C/ED and project representatives.

Fact Sheet—Publication including detailed information about key Site activities on projects for dissemination to anyone upon request. Fact sheets are prepared by Kaiser-Hill Community Relations with approvals from the DOE C/ED and project representatives.

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3.1.13 Decommissioning Operations Plans

Once a building has been characterized and the risks identified, a decision involving regulator and public involvement will be made regarding the magnitude of hazard and degree of regulatory oversight required. This review will lead to a specific decision of whether the decommissioning can proceed under the DPP or for high hazard facilities, if a Decommissioning Operations Plan (DOP) will be required. The DOP will also provide a vehicle for additional public input, whether or not the level of oversight is not justified for technical reasons. In general, buildings which are contaminated with plutonium or uranium are considered high risk and will require the additional attention and consideration of a DOP.

3.2 DQOS/SAPS

SAPs will be required for a wide variety of issues in support of pre-remedial characterization, waste volume calculations, waste characterization, verification of clean up, and for design data needs. Development of ER-specific SAPs is described in Appendix C. DQOs will be developed for all sampling activities. Sampling plans and related DQOs will be focused on collecting data to meet a specific need (i.e., to address a specific decision). Decision-making needs will be linked directly to data collection.

Data quality in terms of laboratory analytical methods will be focused on the primary and secondary data uses. In general, SW-846 analytical methods are appropriate for the documentation of waste characteristics, and these data are also sufficient for risk evaluation, and determination that soils remaining following a clean up are below the levels specified in the ALF. Field screening data are generally sufficient to meet the DQO needs of gross volume calculations before excavation, or for excavation control. A statistical approach will be used where appropriate to determine the number of samples necessary to make a specific decision. Data will not be collected unless a specific decision has been identified for the data.

In collecting characterization or design data, a conceptual model of the IHSS, specific release, or system to be addressed will be developed based on existing data and professional judgment. The conceptual model will address contaminant transport issues such as expected presence of dense non-aqueous phase liquids, connection to higher permeability zones, and containment of the contamination by low permeability clays. Development of a conceptual model incorporating available data helps develop questions that need to be answered with additional data.

The sitewide integrated monitoring plan (IMP) will include the sampling requirements for routine monitoring of surface water, groundwater, air, and ecological resources. This monitoring plan has undergone extensive DQO development for every sample to be collected or item to be monitored on a routine basis.

3.3 ARARS

The RFCA requires that a process for identifying applicable or relevant and appropriate legal requirements for response actions under CERCLA be developed (See RFCA, Part 3, ¶ 10). To accomplish this objective, an RFETS ARARs Master List will be finalized and maintained; ARARs identification will be initiated in earnest when projects are first scoped; ARARs will be determined when the decision document is signed; and interpretation of ARARs during response action will be accomplished using the consultative process.

3.3.1 RFETS ARARs Master List

The RFETS ARARs Master List serves to narrow the universe of potential ARARs. The ARARs Master List can be found in Appendix D. Environmental requirements with little or no likelihood of applicability or relevance and appropriateness (i.e., Coastal Zone Management) are removed from consideration.
The RFETS ARARs Master List will be updated as needed. For instance, final promulgation of the Hazardous Waste Identification Rule (HWIR) Waste or HWIR Media rules will require a comprehensive reanalysis and significant changes to the Master List. Parallel updates to the ARARs Master List provided in the DPP will be developed to update the DPP ARARs from a decommissioning perspective.

3.3.2 Project-Specific ARARs Analysis

ARARs will be initially identified when projects are first scoped. The identification will be conducted consistent with the NCP, the preamble to the proposed and final NCP, CERCLA Compliance with Other Laws Manuals Part 1 and Part II, and other EPA ARARs guidance.

The identification will begin by evaluating the ARARs Master List for actual applicability or relevance and appropriateness. Once the ARARs are narrowed down, the final presentation and determination will occur in conjunction with approval of the decision document.

ARARs interpretations during remedial actions will be accomplished using the consultative process. Where documentation is warranted, TMs will be prepared.

3.3.3 Permit Waivers

The RFCA provides waiver of administrative requirements, including the need to obtain federal, state or local permits for decommissioning and for remedial actions occurring in the buffer zone.

The authority for this waiver, CERCLA 121(e)(1) limits the waiver to actions conducted entirely onsite. The definition of onsite is also important to onsite disposal of investigative derived material and other low risk wastes (i.e., soils) contaminated with trace hazardous substances. Because the buffer zone OU is included in the definition of onsite, by operation of RFCA, disposal of select remedial action wastes in the present landfill is considered onsite and is not subject to the CERCLA offsite disposal policy.

3.4 RISK EVALUATION

The evaluation of human health and ecological risk is central to the implementation of the RFCA. Section B.2.a of RFCA states that risk reduction through the removal of contamination sources will be the priority. It is reiterated throughout the document that unacceptable risk will be reduced by remediation or management actions. The only way to document risk reduction is through the risk assessment process.

Under the authority of CERCLA, the EPA has developed guidelines for the evaluation of human health and ecological risks and hazards. Site-specific guidance and parameters to be used in risk evaluations have been negotiated among the DOE Rocky Flats Field Office (RFFO), the EPA, and the CDPHE (DOE 1995a, 1995b, 1995c). The purpose of this section is to document agreed upon risk

methods and parameters, and at which points they may be applied in the risk management process defined by the RFCA and the ALF.

The RFCA defines action levels, as presented in the ALF, as "numeric levels of contamination in groundwater, surface water, and soils which, when exceeded, trigger an evaluation, remedial action and/or management action." A major component of any evaluation should be a detailed assessment of the risks associated with exceeding the action level. Management decisions and remedial actions should be based on a complete knowledge of the risks to human health and the environment. The site-specific human health risk assessment (HHRA) methodology (DOE, 1995a) coupled with the ecological risk assessment methodology (ERAM) (DOE, 1995d, 1995e) provide the necessary tools. The risk assessment methodology also includes the conservative screen, developed by the CDPHE and agreed to by the DOE (EPA 1994a, DOE 1994, CDPHE/EPA/DOE 1994). These methodologies are discussed in more detail in Appendix E.

3.4.1 Implementation of Risk Assessment Methodologies Within the RFCA Framework

Figure 3-8 shows how the ALF compliments the risk assessment process as developed at RFETS. When a Tier I or Tier II action level is exceeded due to the presence of a single contaminant, the area of concern is placed in the ER rankings and risk management options are evaluated. If multiple contaminants are present, then further risk evaluation is needed.

When multiple contaminants are present, the risk manager must be sure that decisions are made using the cumulative risk from the contaminants. The multiple contaminant screen (MCS) will provide this assurance. For the MCS, data are aggregated and the area of concern (AOC) chosen by the methods agreed to for the CDPHE screen. Ratio sums are determined using the programmatic preliminary risk-based remediation goal (PPRG) for the appropriate scenario; open space recreational for the buffer zone and office worker for the IA. If the ratio sum is less than 1, then the CDPHE screen may be applied and the AOC may become a candidate for an NFA recommendation. If the ratio sum from the MCS is between 1 and 100, then a more detailed risk evaluation is warranted to ensure that an appropriate risk management decision is made. The risk evaluation must include an analysis of all relevant exposure pathways and receptors, but results should be reported in a condensed format (e.g., a letter report). This detailed evaluation may be deferred to the OU-wide BRA rather than generating multiple risk evaluations. When the ratio sum from the MCS is greater than 100, the AOC is placed in the ER rankings and risk management options are evaluated.

3.4.2 ER Risk-Based Ranking

Environmental restoration projects are being prioritized based on an approved methodology for producing a risk-based ranking of the IHSSs. The methodology reflects the RFCA and ALF (see Section 3.5).

3.4.3 OU-wide Comprehensive Risk Assessment

Part 8 of the RFCA states that after all accelerated actions have been completed, Site conditions including residual risk from accelerated actions, will be evaluated and corrective/remedial action decisions will be rendered on an OU by OU basis. It is also stated that the final CAD/ROD for the buffer zone and the IA must be consistent with CERCLA, §120.

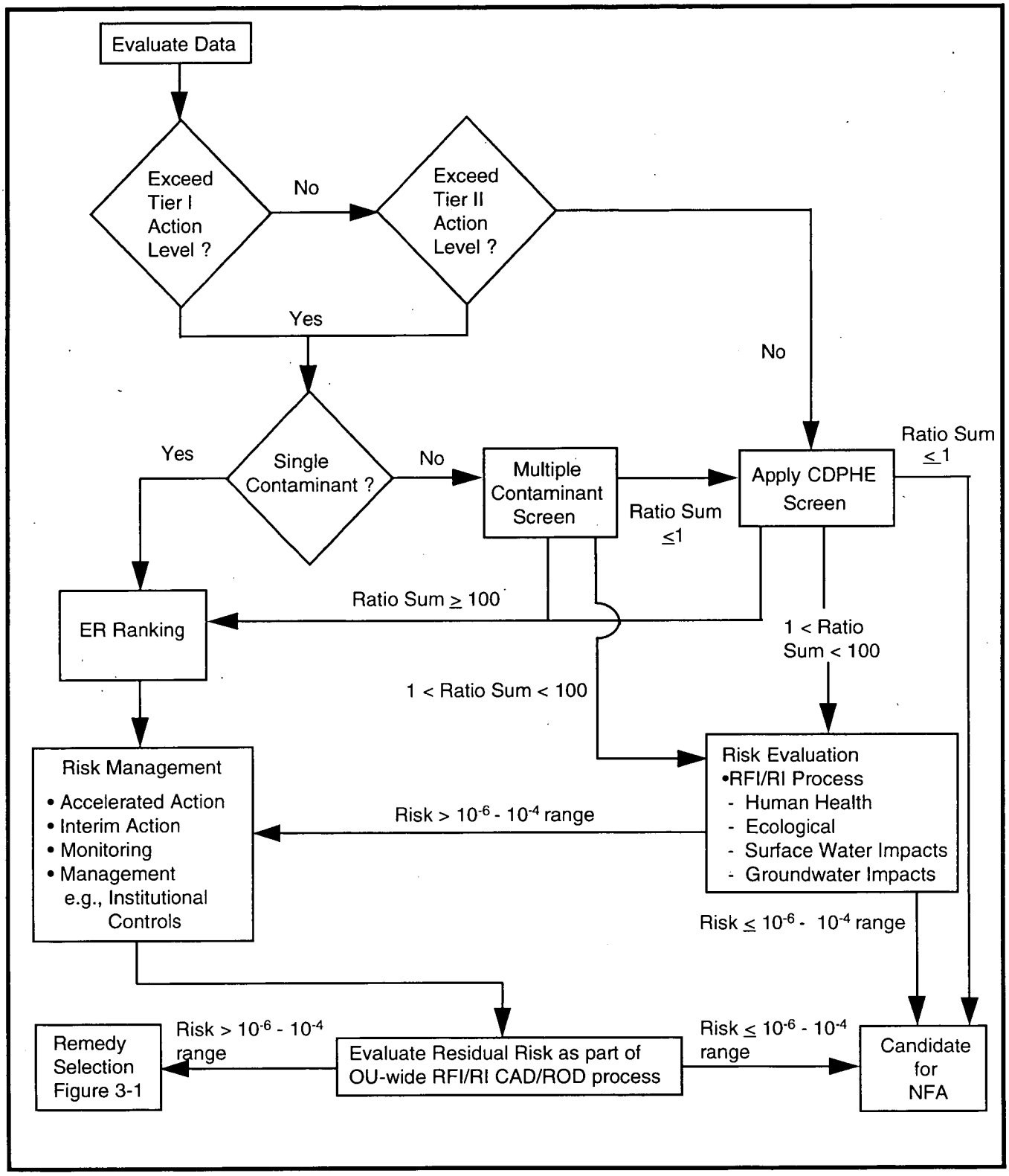

Figure 3-8 Implementation of the Risk Assessment Framework

These statements are consistent with the agencies' position that a comprehensive Sitewide risk assessment must be completed, including an evaluation of the contribution of all sources of risks and hazards to offsite receptors, before a final CAD/ROD for each of the two OUs can be accepted.

The methodology for performing the Sitewide risk assessment has not been finalized. It has not been determined if there will be one sitewide BRA including all of RFETS, or if two OU-wide BRAs will be developed; one for the buffer zone and one for the industrial area. It is recommended that the same methodology is used for both. The exposure scenarios and factors previously agreed upon should be used; however, the procedure for data aggregation and determination of how source areas will be combined for evaluation must be decided.

3.4.4 Radiological Dose Evaluations

Radiological dose evaluations of residual radioactive materials are required to ensure protection of public health under the DOE order 5400.5 (DOE 1990) and to implement DOE's "as low as reasonably achievable" (ALARA) policy (DOE 1991). It has been agreed upon by DOE, EPA and CDPHE to use the preliminary proposed 40CFR196, EPA's draft Radiological Site Cleanup Regulations for calculation of radionuclide action levels in soils. To be consistent with the RFCA and the ALF, all dose calculations will be done using RESRAD, the computer code developed by the Argonne National Laboratory for DOE to facilitate the implementation of residual radioactive materials guidelines, and site-specific exposure scenarios, exposure factors, and environmental parameters. A detailed explanation of the derivation of radionuclide action levels for soils is provided in the *Technical Justification Document for Radionuclide Levels in Soils* in the Appendix F (To be inserted at later date).

3.4.5 Investigation and Remediation Derived Materials

Under procedure 4-H46-ENV-OPS-FO.29 (FO.29) investigation derived materials must undergo a risk-based screen similar to the conservative screen, but using a different set of risk based concentrations risk-based concentrations (RBCs). The acceptance of the RFCA and the ALF now makes it possible to handle newly-generated materials as part of a remedial action. Procedure FO.29 must be modified so that the ALF level appropriate to the receiving area is used in the screen. This change can be accomplished by using the following decision criteria:

1. If returning the materials to the place of origin:

    a. Apply the ALF for surface soils to all materials originating in the buffer zone.

    b. Apply the office worker ALF to all materials originating in the IA.

2. If materials will be disposed in the present landfill, apply the ALF subsurface soils.

3. If disposing of materials offsite, determine appropriate screen and data needs in consultation with the receiving state.

3.5 IMPLEMENTATION OF ACTION LEVEL AND STANDARDS FRAMEWORK

The ALF was developed by a working group consisting of DOE, EPA, CDPHE, and the Kaiser–Hill team. The group was formed to develop a consensus proposal for the appropriate cleanup standards

that should apply to RFETS. The ALF is included in RFCA as Attachment 5. The goals of the ALF are to:

1. Provide a basis for future decision making

2. Define the common expectations for all parties

3. Incorporate land– and water–use controls into site cleanup.

As defined in the ALF:

> *Action levels* are numeric levels that, when exceeded, trigger an evaluation, remedial action, and/or management action. Action levels will not necessarily be the same as *cleanup levels* which must be achieved for a remedial action to be complete. A *standard* is an enforceable narrative and/or numeric restriction established by regulation and applied so as to protect one or more existing or potential future uses. Within this framework, standards are associated with surface water use classifications and applied at points of compliance. Standards are not being directly applied to ground water or soils.

The development of RFETS action levels for all media is based on promulgated standards (i.e., maximum contaminant level (MCLs) and state water quality standards), where available. For those analytes without standards, action levels are based on programmatic preliminary remediation goals (PPRGs). PPRGs are chemical–specific and medium–specific risk–based concentrations that were calculated for each exposure scenario (e.g., office worker, open–space recreational user) using site–specific exposure factors, standard toxicity factors, and a risk level of 1E–6.

The application of the ALF to surface water and groundwater is described in detail in the Integrated Monitoring Plan (under development) and is shown in Figure 3-9. Development of decision rules and applicable data quality objectives (DQOs) to monitoring has been an ongoing effort with a DQO team involving the cities, CDPHE, EPA, DOE, Kaiser–Hill, and RMRS.

The action levels for some naturally-occurring inorganics (including both metals and radionuclides) for soils and groundwater are below the background upper tolerance level (UTL) for several naturally-occurring constituents. Where the action level is below the background UTL, the background UTL will be used as the action level. Examples of this occurrence are uranium (all isotopes) and manganese.

The action levels for surface soil were developed to be protective of human exposure under the appropriate land use conditions. The methodology used for developing surface soil action levels is described in RFCA, Attachment 5. The application of surface soil action levels is shown in Figure 3-10.

The application of subsurface soil action levels for volatile organics is shown in Figure 3-11. For the remaining constituents (e.g., metals, radionuclides, and some organics), subsurface soil action levels have yet to be calculated.

The ALF Working Group is currently developing action levels for radionuclides in soil based on the 15/85 mrem per year dose limits. The use of radiation dose to develop action levels is consistent with EPA's draft 40 CFR 196 (Radiation Site Cleanup Regulations), NRC decommissioning requirements,

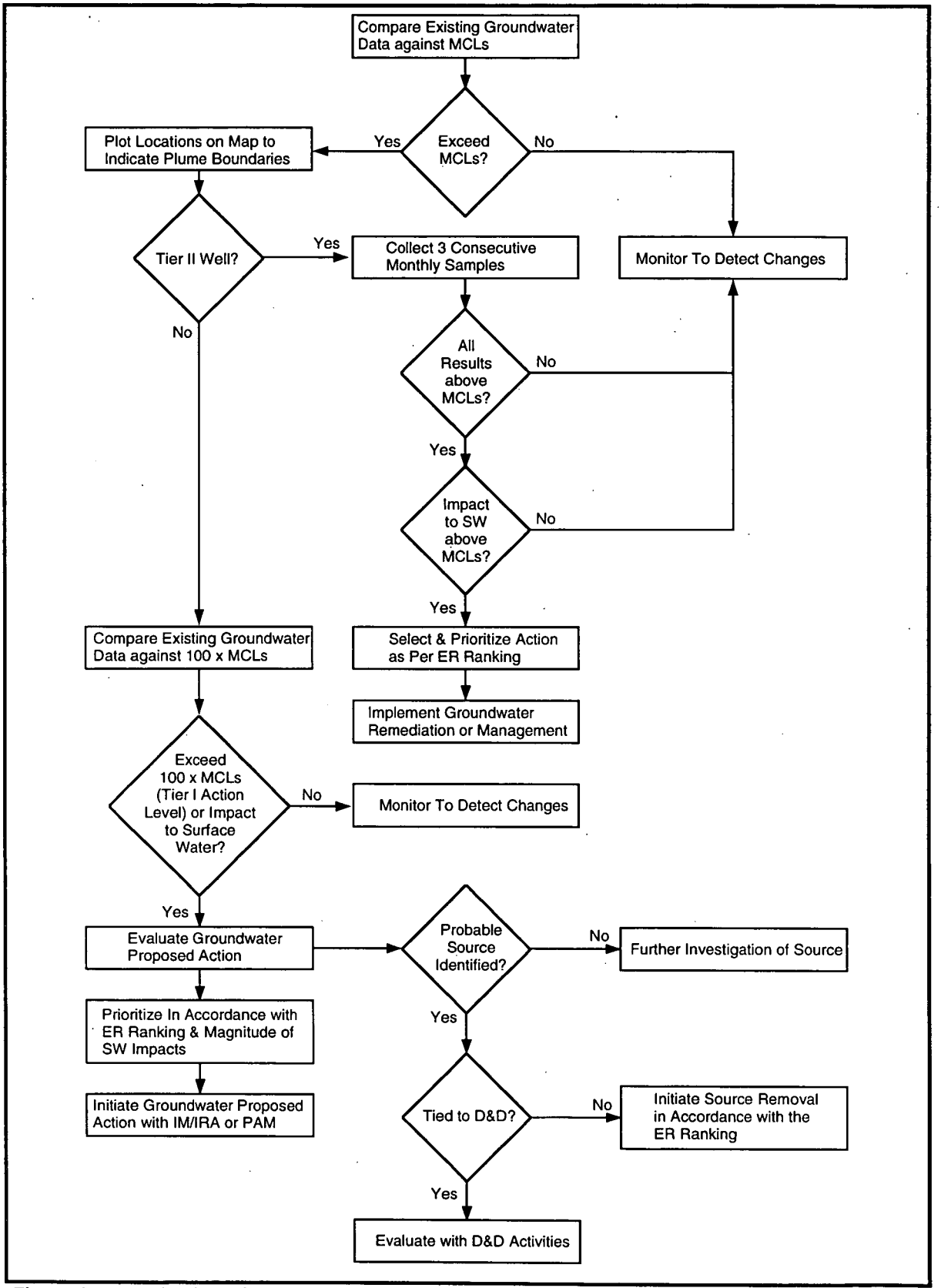

Figure 3-9 Application of Groundwater Action Levels

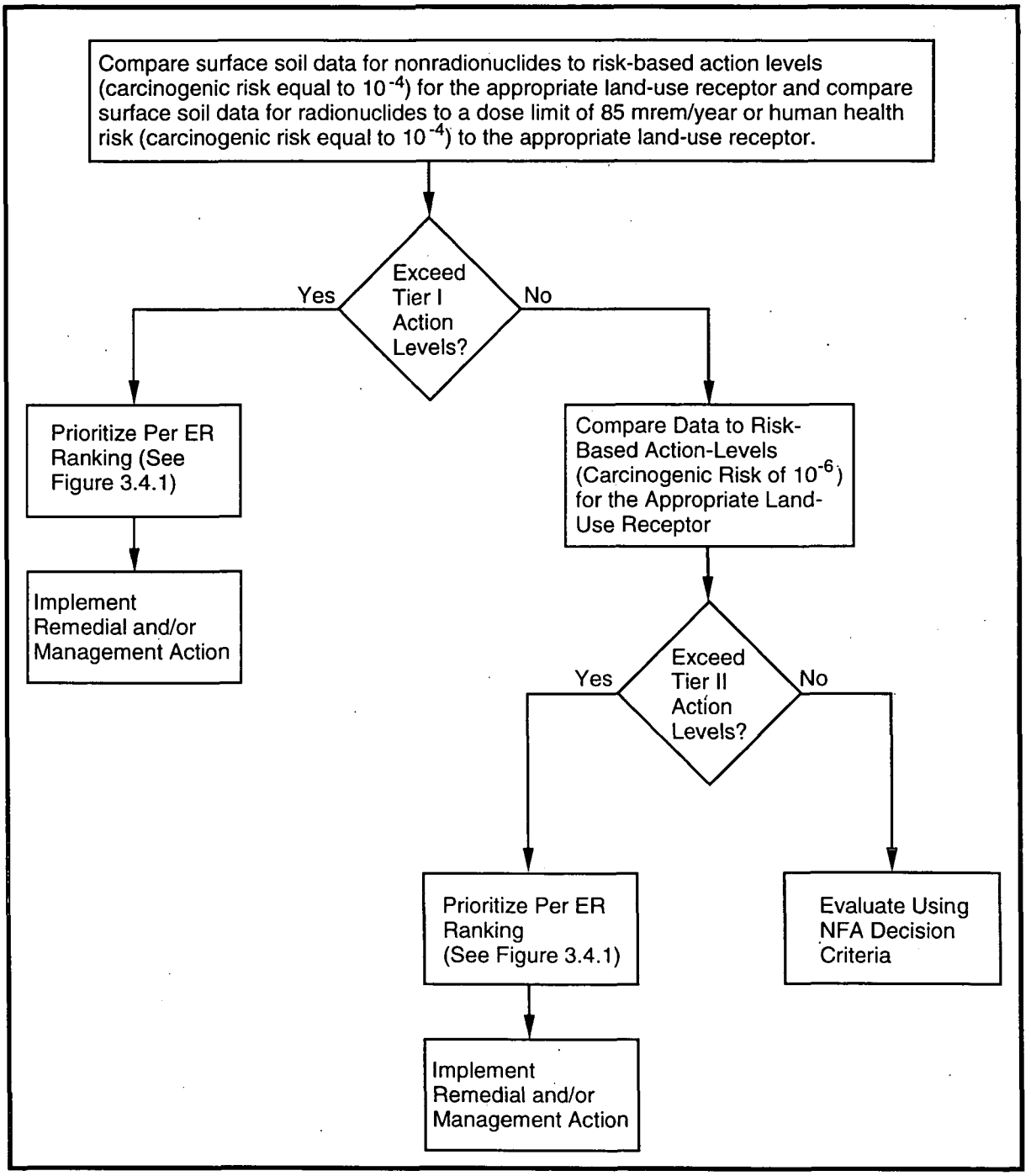

Figure 3-10 Application of Surface Soil Action Levels

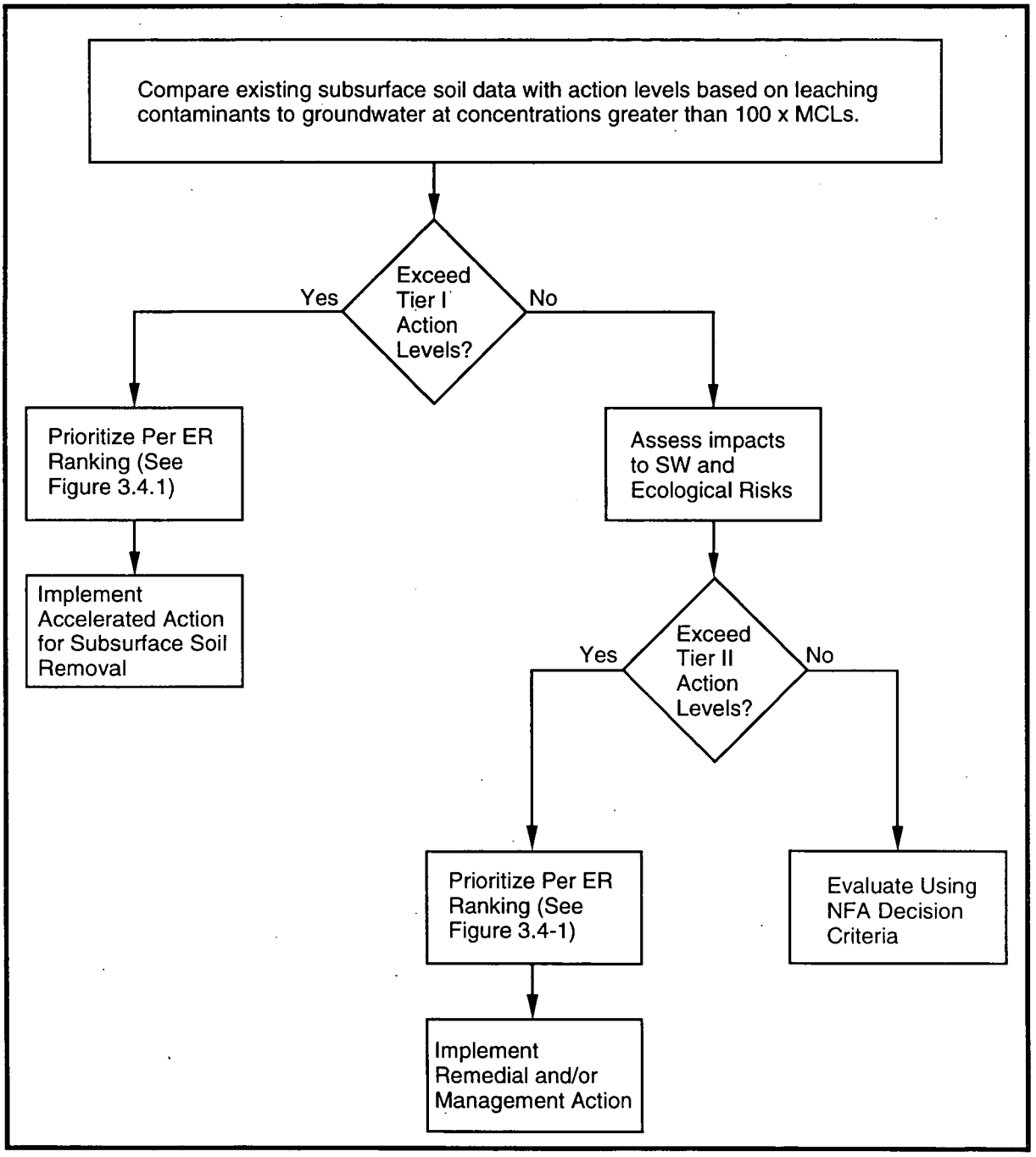

Figure 3-11 Application of Subsurface Soil Action Levels

and DOE's draft 10 CFR 834. EPA concluded that a dose–based process is preferred to a risk–based process in protecting the public from radiation exposure (40 CFR 196). The dose assessment process incorporates all pertinent facets of the risk assessment process. The Working Group has chosen the RESRAD computer model to translate the radiation dose–based requirements into soil action levels. Details on this methodology and the development of action levels for radionuclides in soil (surface and subsurface) are forthcoming and will be appended to this implementation guidance document when they become available.

Interrelationship Between ALF and the NFA Process

When analyte levels exceed Tier I action levels, a process to identify, evaluate, and implement efficient, cost–effective, and feasible remediation or management actions will be triggered. When analyte levels exceed Tier II action levels, they will be managed. Conversely, if a Tier II action level is not exceeded and adequate data are available, a geographical area may be evaluated for an NFA recommendation, using the criteria presented in Attachment 6 of RFCA and as discussed in Section 3.1.9 of this implementation guidance document. However, action levels alone cannot be used to determine if an area is a candidate for NFA.

As stated in ¶ 76 of RFCA, "while the Parties recognize that is would be premature for EPA to make an ARARs determination at this time, the Parties expect that the ALF action levels and cleanup standards will inform EPA's ultimate decision. Similarly, the Parties recognize that the Framework cleanup standards are not State water quality standards, which only the Colorado Water Quality Control Commission has the authority to establish, although most are consistent with such standards." In other words, it is likely that the action levels developed as part of RFCA will become site–specific ARARs for RFETS that can be used to develop cleanup levels for a geographical area. As such, these action levels should be used consistently with the purpose of ARARs.

In 40 CFR Part 300, National Oil and Hazardous Substances Pollution Contingency Plan (EPA, March 8, 1990), EPA provides a rationale as to why action levels or ARARs cannot be used as the sole decision criterion in the risk assessment/NFA process:

> The identification of ARARs is a separate part of the RI, because many ARARs are not directly risk related....Risk assessment and ARARs serve different functions. The identification of ARARs is used to identify remediation goals and to indicate how remedial alternatives are to be implemented. In contrast, the risk assessment is a technical analysis of the risks posed by hazardous materials at a site. Consequently, it would be inappropriate for these two elements to the RI/FS to be done together.... ARARs generally do not provide an adequate basis on which to determine site risks, which are complex and often cannot be reduced to a single number. Further, EPA notes that CERCLA requires that all Superfund remedies be protective of human health and the environment but provides no guidance on how this determination is to be made other than to require the use of ARARs as remediation goals, where these ARARs are related to protectiveness....To the degree possible, EPA makes use of chemical–specific ARARs in determining remediation goals for Superfund sites. However, because these standards are established on a national or statewide basis, they may not adequately consider the site–specific contamination or the cumulative effect of the presence of multiple chemicals or multiple exposure pathways and, therefore, are not the sole determinant of protectiveness.

Once risk managers have determined that a remedial action is necessary, the RFETS action levels may be used to negotiate site–specific cleanup levels for an area of concern. For single–contaminant sources, such as polychlorinated biphenyls (PCBs), this is a simple process. However, for multiple–contaminant sources the additive impacts of the chemicals to the site risk must be taken into consideration. As stated in Section 3.4, Risk Evaluation, the cumulative residual risk goal is the range from 1E-4–1E-6 for the appropriate receptor. Remediated areas that have achieved a cumulative residual risk in the 1E-4 to 1E-6 risk range will proceed to NFA documentation.

The number of data points needed for making a residual risk determination will be determined based on the sample medium and size of the remediated area. In turn, the type of statistics used to compare residual risk to cleanup levels (e.g., 95 percent UCL, mean, maximum, lognormal distribution) will depend on sample size, sample type (medium), EPA guidance and/or industrial standards.

3.6 ANNUAL UPDATES OF THE ENVIRONMENTAL RESTORATION RANKING

The RFCA Attachment 4 contains the prioritized list of ER sites developed to select the top priority sites for remediation (RMRS 1995). This prioritization will focus the cleanup process, which will address higher-risk sites before low-risk sites, thus more quickly reducing risks to human health and the environment. The prioritization of cleanup targets should also result in a reduction of costs associated with cleanup by allowing better planning and more efficient utilization of resources.

The prioritization methodology was developed by a working group of EPA, CDPHE, DOE RFFO, Kaiser-Hill, and RMRS staff and was implemented by RMRS. The result was a prioritized list of ER sites, including a list of ranked sites that require more information.

In accordance with RFCA Attachment 4, the ranking will be updated annually, or more frequently if significant new information or additional cleanup levels become available. If no cleanup or investigation activities occur within a fiscal year, the ranking will not be updated that year. With the consensus of all parties, the priority of any ER site can be changed before updating the list, if additional information indicates that this is required. Appendix G presents the general methodology for ranking ER sites, including media-specific evaluations and chemical score tabulation.

3.7 ANNUAL UPDATES FOR HISTORICAL RELEASE REPORT

According to the RFCA, the HRR is the document required by CERCLA §103(c) describing the known, suspected or likely releases of hazardous substances from RFETS. Original authorization for the HRR was provided in Section I.B.5 of the 1991 IAG. The HRR, which was published in June 1992, provided a complete listing of all known spills, releases and/or incidents involving hazardous substances that had occurred since the inception of Rocky Flats.

Section I.B.3 of the IAG established the requirement for DOE to notify EPA and CDPHE of any newly identified or suspected releases or threats of release at RFETS, which may threaten human health or the environment. HRR updates were initially required every three months; however, all three parties to the IAG have agreed that DOE can submit HRR updates annually. The first annual HRR update report will be delivered on August 30, 1996.

The process for updating the HRR has been developed through negotiations and document reviews from DOE, EPA, and CDPHE. As shown in the example presented in Appendix H, the document format includes a description of the release event, complete physical and chemical descriptions of the constituents released, validated analytical data, responses to the events, fate of the constituents

released, action/no action recommendations, comments, and a reference section. Additionally, signature lines for DOE, EPA, and CDPHE concurrence are provided in the HRR updates.

Among other purposes, the HRR updates serve as a basis for approving soil disturbance permits and as an aid in making waste determinations and in deciding the appropriate level of personal protection equipment for work in an IHSS. RFCA Attachment 6, No Action/No Further Action/No Further Remedial Action (NFA) Decision Criteria for RFETS, expands the scope of the HRR updates to include information on geographic areas for which an NFA recommendation is warranted. HRR updates were selected as the vehicle for recommending NFA decisions, tracking IHSS status (e.g., boundary changes), and communicating IHSS information (e.g., analytical information for waste determinations required by EPA and CDPHE). The NFA decisions recommended in the HRR updates are intended to be "place keepers". An IHSS can be placed on hold until the NFA working group or another appropriate body agrees that initiating the OU-wide administrative process (PP, CAD/ROD, RCRA Permit Modification, etc.) for IHSS closure is beneficial.

3.8 DISPUTES

Part 15 of the RFCA enumerates procedures for dispute resolution. As a general admonition, RFCA directs the parties to informally resolve disputes in the first instance. Where the dispute cannot be informally resolved, the RFCA directs the parties to quickly raise the disputed issue.

The types of disputes identified in the RFCA include:

- Disapproval of a Proposed Final Document (RFCA ¶179)
- Denial or Partial Grant of a Change Requested for a Regulatory Milestone (RFCA ¶s 160, 179, 194)
- Stop Work Orders (RFCA ¶167)
- *Force Majeure* (RFCA ¶165)
- Permit Waivers (RFCA ¶16)
- Proposed Permit Modifications (RFCA ¶ 22)
- Accelerated Actions (RFCA ¶69)
- Decommissioning (RFCA ¶69)
- Determinations That Conditions or Activities Constitute a Release of Threat of Release (RFCA ¶69)
- Corrective Action Management Unit (RFCA ¶82)
- Changes to Regulatory Milestones (RFCA ¶S160, 194)
- Additional Work Required Under CERCLA (RFCA ¶190)

The RFCA also identifies five classes of disputes and specifies the procedures for each. The five classes of disputes include:

- Decisions by Lead Regulatory Agencies
- Disputes Regarding Additional Work Required Under CERCLA
- Disputes Regarding Budget and Work Planning
- EPA-State Disputes Regarding Sitewide Issues
- Disputes Regarding Overall Direction of Proposed Work

3.8.1 Decisions By Lead Regulatory Agencies

The RFCA creates two organizations to perform dispute resolution. The Dispute Resolution Committee (DRC) consists of the following individuals:

CDPHE	Hazardous Waste and Materials Management Division Director
DOE	Assistant Manager for Strategy, Integration and Guidance, RFFO
EPA	Region VIII Assistant Regional Administrator for Ecosystems Protection and Remediation

The DRC is the first level of formal dispute resolution. The second level of dispute resolution is the Senior Executive Committee (SEC). The SEC consists of the following individuals:

CDPHE	Director, Office of Environment
EPA	Assistant Regional Administrator
DOE	Manager, RFFO

The SEC receives disputes that the DRC has unanimously elevated without resolution or disputes that the DRC has resolved but are under appeal. A schematic of the process is provided in Figure 3-12.

3.8.2 Disputes Regarding Additional Work Required Under CERCLA

Disputes regarding additional work required under CERCLA follow the basic procedures outlined in Figure 3-12. It should be noted that authority to review appeals of SEC decisions is controlled by RFCA ¶ 69.

3.8.3 Disputes Regarding Budget and Work Planning

DOE disputes regarding budget and work planning employ the procedures diagrammed in Figure 3-13.

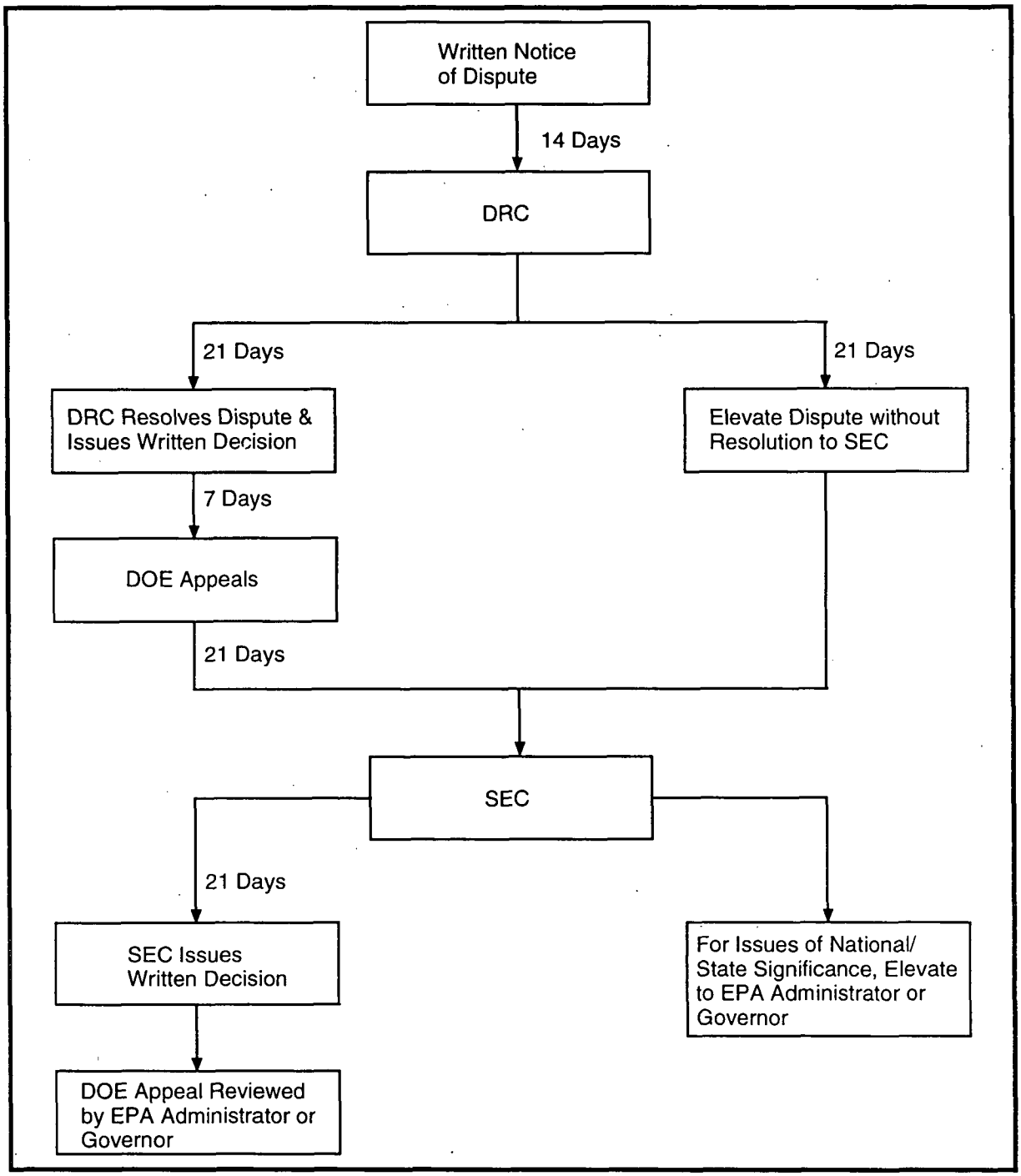

Figure 3-12 Disputes Regarding Decisions by The Lead Regulatory Agency

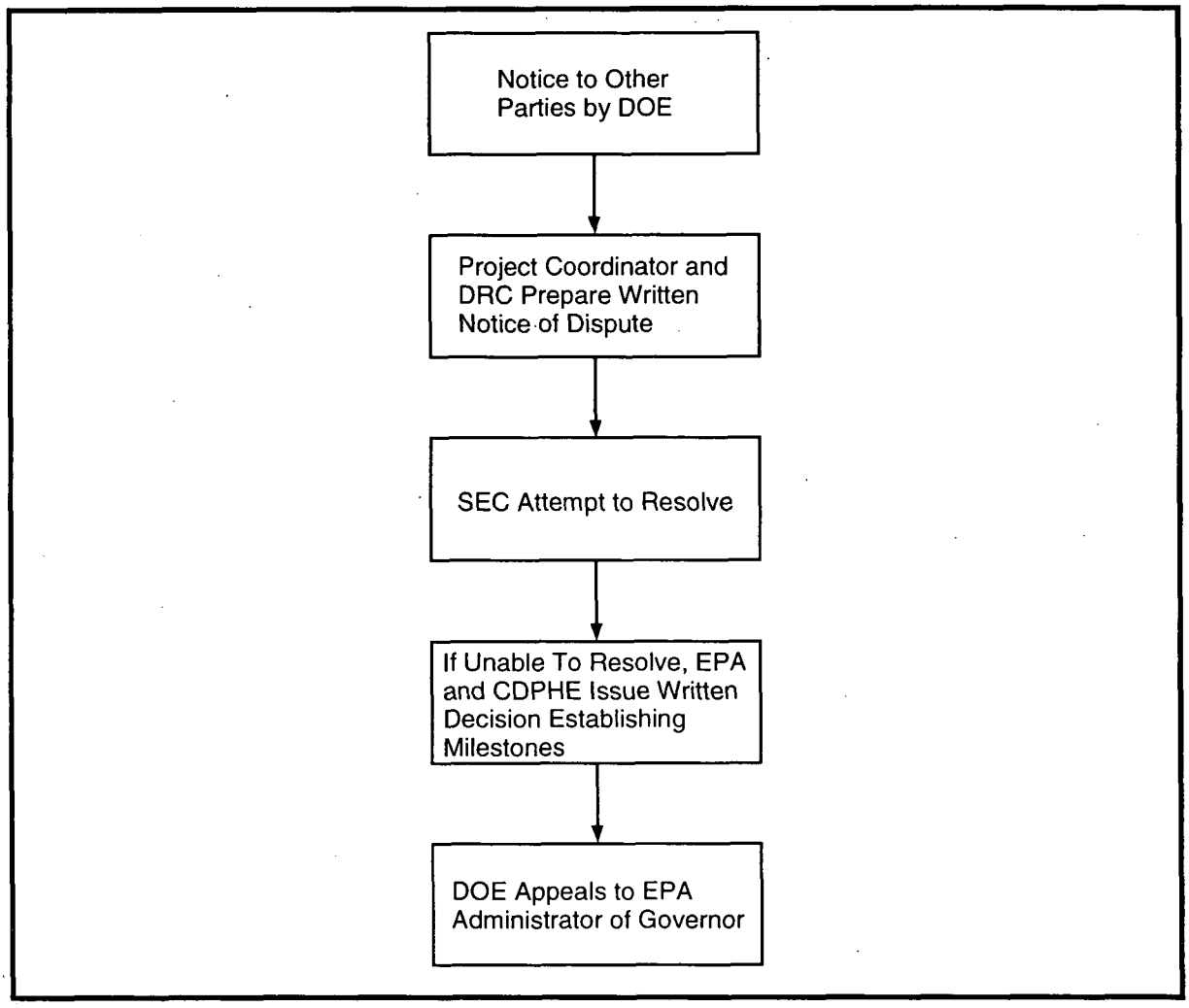

Figure 3-13 Disputes Regarding Budgeting and Work Planning

3.8.4 EPA–State Disputes Regarding Sitewide Issues

For purposes of EPA-State disputes regarding sitewide issues the State-EPA Dispute Resolution Committee (SEDRC) and the State-EPA Senior Executive Committee (SESEC) have the same composition as the DRC and SEC except that the DOE does not vote on those committees.

The RFCA identifies the following as sitewide issues:

- proposed plans/draft permit modifications
- CADs/RODs
- Updates to the Environmental Restoration Ranking
- Updates to the IGD
- Future RSOPs for activities regulated under this agreement that are related to more than one OU
- Treatment systems that will treat wastes from the IA and the buffer zone
- Treatability study reports for activities that are related to more than one OU
- Integrated Monitoring Plan
- Updates to the Community Relations Plan
- Updates to the Historical Release Report

DOE disputes regarding sitewide issues employ the procedures diagrammed in Figure 3-12.

3.8.5 Disputes Regarding Overall Direction of Proposed Work

If one of the project coordinators is unable to concur with the overall direction of proposed work, dispute resolution employs the procedures outlined in 3.8.1 with minor changes (See paragraph 206 f the RFCA for details).

3.9 CHANGES

The RFCA identifies two types of decision modification. Major modifications represent a significant departure from the approved decision document. Major modifications subject the change to the same review and approval process applied to the original determination.

In contrast, a minor modification is a change that achieves substantially the same level of performance using a different technique. In effect, the change does not affect the final result of the activity. Prior approval of a minor modification is not always required – although advance notification is. If the LRA disputes the appropriateness of a minor modification, a stop work order can issue.

3.10 NPL DELISTING

The site delisting process begins upon approval and acceptance of the buffer zone and IA CAD/RODs. There are five steps in the delisting process:

1. Preparation of the Notice of Intent to Delete with EPA and State review and approval

2. Publication of the Notice of Intent to Delete in the Federal Register for public comment

3. Publication of the Notice of Availability for the Notice of Intent to Delete

4. Publication of the Notice of Deletion along with the comment responsiveness summary in the Federal Register

5. Placement of the final information package in local information repositories

It is possible to partially delist those portions of the site where NFAs or remedies involving institution controls have been implemented. Deletion of the site from the NPL may occur before the cessation of operation and maintenance activities specified in the CAD/ROD. In addition, 5-year reviews may be required after delisting.

4.0 ADMINISTRATION

This section provides an overview of the following: the federal budgeting process, requirements for planning, authorizing, and controlling a project, compilation of the Administrative Record, records management and document control, and reporting requirements.

Section 4.0 has been written in conjunction with RFCA and RFETS standard policies and practices which provide policy and procedural direction for the diverse administrative functions performed at the Site. The referenced plans, procedures, and documents are intended to supplement the guidance and minimum requirements presented in this section.

4.1 BUDGET PLANNING AND EXECUTION

All Site fiscal budgeting shall be done in accordance with site procedure 1-R97-F&A-MCS-001, Management Control System (MCS) and fiscal year (FY) Planning and Budget Baseline Document (FY Budget Call Document).

4.1.1 Regulator Participation in the Budget and Planning Process

This section provides an overview of the Regulatory Agencies participation in the budget and planning process. Figure 4.1 delineates DOE, EPA, and CDPHE interface points during the this process. Refer to Part 11, Subpart A, section 128-142 of the RFCA for detailed information regarding these interface points.

FY Activities

FY activities are those activities occurring during the current FY that apply to the same FY.

April – May

- Within 30 days following the completion of DOE's annual midyear management review, RFFO shall brief EPA and CDPHE on any decisions that affect regulatory milestones under the RFCA.

July – September

- DOE, EPA, and the CDPHE evaluate the current schedule, cost and funding status of all projects in progress in the just-ending fiscal year, particularly those activities or projects that are on the critical path to meeting regulatory milestones in the upcoming two fiscal years.

In addition, DOE, CDPHE, and EPA project coordinators will meet periodically through the FY to monitor and discuss the status of projects scheduled during the year. DOE will promptly notify EPA and CDPHE of any proposed site-specific or programmatic action, if such action may have an impact on DOE's ability to meet the baselines or regulatory milestones of RFCA.

FY+1 Activities

FY+1 activities are those activities occurring during the current fiscal year that apply to the next fiscal year.

July – October

- DOE will consult with EPA and CDPHE in the development, verification, and review of draft work packages for FY+1.

- Review and revise baseline and regulatory milestones as necessary.

October – December

- Within 45 days after Congressional appropriation of the FY budget, RFFO and DOE-HQ shall brief EPA and CDPHE on the budget appropriation and tentative funding allocations for the new fiscal year.

- No more than 60 days after Office of Management and Budget (OMB) apportions DOE funds, DOE, EPA and CDPHe shall evaluate schedule, cost, and funding status of projects for FY and FY+1.

If there is a delay in Congressional appropriations beyond the first of the new fiscal year, RFFO shall inform EPA and CDPHE of any continuing resolutions, and of the impact of the delay on its ability to meet regulatory milestones and other requirements of the RFCA. EPA and CDPHE will review these actions and may recommend reallocation of available funds.

Cost Savings Initiatives and Productivity Improvements

DOE, EPA and CDPHE shall consult during the RFETS budget planning and execution processes to identify and evaluate opportunities and incentives to improve productivity and reduce costs associated with environmental management activities at RFETS.

Standards, requirements and practices shall be regularly reviewed to determine that activities at RFETS are conducted in a manner that is sufficient to achieve compliance with requirements and to protect workers, the public, and the environment, and necessary to accomplish the RFCA Preamble objectives expeditiously and efficiently.

Refer to Part 11, Subpart C, Section 151-155 of the RFCA for additional guidance on cost savings and productivity improvements.

4.1.2 Project Funding

Funding at RFETS is based on the FY cycle. The federal fiscal year starts on October 1 and ends on September 30 of the following year. The FY is designated by the calendar year in which it ends. At any given time, three FYs are under consideration:

- FY (also called the execution year) – where contracts are in place and work is being performed;

- FY+1 (also called the budget year) – where Congress debates DOE's budget request and appropriates funds; and

- FY+2 (also called the planning year) – where plant activity requirements are identified and a budget developed.

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4.1.3 Budget Process (Project Funding)

The budget process has three main phases: (1) executive formulation and transmittal; (2) Congressional action; and (3) budget execution and control.

Executive Formulation and Transmittal

- The process of formulating the budget begins no later than the spring of each year, at least 9 months before the budget is transmitted and at least 18 months before the budget year begins.
- The President transmits his budget to Congress early in each calendar year, 8 – 9 months before the fiscal year to which that budget applies.
- OMB issues general policy directions and planning ceilings to the agencies, both for the budget year and for the following four years.
- Agency budget requests are submitted in September to OMB.

Congressional Action

Congress can approve, modify, or reject the President's budget proposal. It can change funding levels, eliminate programs, or add programs not requested by the President.

Budget Execution and Control

Once approved, the President's budget, as modified by Congress, becomes the basis of the financial plan for the operations of each agency during the fiscal year. The Director of OMB apportions appropriations (funding) to each agency by time periods and by activities.

4.2 PROJECT PLANNING/SCOPING/AUTHORIZATION BASIS/MASTER ACTIVITY LIST (MAL)

To accomplish work effectively at RFETS, the Authorization Basis Process must be closely coupled with the processes for planning and authorizing work.

4.2.1 Project Planning/Project Scoping

The RFETS MCS system incorporates methods and procedures for planning, authorizing, and controlling a project so that work can be performed to defined specifications, schedule, and budget. The system defines the processes for: (1) organizing and defining work; (2) assigning, planning, and authorizing work; (3) measuring work performed; (4) analyzing and reporting work performed; and (5) controlling changes to an established baseline.

All RFETS project planning shall be done in accordance with site procedure 1-R97-F&A-MCS-001, MCS, FY Planning and Budget.

Scope

The project scope formally establishes the project mission, functional objectives, scope of work, technical approach, regulatory requirements, and assumptions. Project scope is determined by the project mission needs, objectives, and regulatory requirements. Simply stated, the "scope" identifies the work planned to be accomplished.

RFETS procedure, Activity Definition Process (1-R32-ADM-02.38, Revision 0) should be used to identify and describe specific activities within the scope of a work package.

Schedules

The critical path method of scheduling is used for the establishment of schedule baselines. Total life-cycle of a project is scheduled; however, near-term work may be in greater detail than outyear work. Ongoing coordination between DOE, EPA, CDPHE, and its contractors will occur to determine the appropriate target dates for subproject milestones.

Integrated Sitewide Baseline

All work performed by DOE at RFETS will be scheduled and integrated by inclusion in a controlled master resource loaded critical path method (CPM) schedule, referred to as the Integrated Site Baseline Schedule (ISB), that will include the life cycle schedule of all the work scope included in the RFETS Strategic Plan. Schedule detail will reflect a "Rolling Wave" method of scheduling which produces a decreasing level of detail as time in extended from the current Fiscal Year. The ISB will be used to direct and manage RFETS contractor and subcontractor work efforts while being the basis for current year and out year budgeting and planning. All schedule reports, both internal and external (DOE, EPA, CDPHE, Stakeholders, etc.), will be produced from the ISB, individual schedules not incorporated into the ISB will not be recognized.

The ISB is the basis against which planning and project performance will be evaluated. A cost and resource loaded schedule allows the evaluation of planning alternatives as they relate to funding and resource constraints, while insuring the plan maintains the logical sequence of activity execution as the plan proceeds through multiple iterations. The ISB will also be used to manage the project and evaluate performance in prior and current fiscal years. The current working schedule and budgets will be updated using actual costs and schedule status to be compared to the baseline in the calculation of cost and schedule variances.

DOE shall develop, by August 1, 1996, an ISB that depicts activities and milestones necessary to achieve the end of the Intermediate Site Condition. The ISB reflects planning assumptions that are agreed to by DOE, EPA and CDPHE. Changes to the project baseline which could lead to delays of important milestone completion dates will be approved by DOE, EPA and CDPHE as defined in RFCA. The ISB shall be statused monthly and updated as required, at a minimum on an annual basis.

Baseline Change Control—The Change Control Process is the mechanism used by DOE, EPA, or CDPHE to assure that scope, schedule, or cost changes are reviewed for need, justification, and impact in a structured manner, and to assure that all parties can fulfill their responsibilities. This process is defined in the RFCA, Part 10 (Changes to Work). If the change will affect regulatory milestones,

DOE shall identify proposed modifications to the regulatory milestones in accordance with RFCA, Part 12 (Changes to Regulatory Milestones) and notify the other parties of modifications to the baseline.

Milestones

EPA and CDPHE shall establish milestones from the ISB; no more than 12 milestones total per fiscal year. Milestones shall be designed to:

- Provide Accountability for Key Commitments;
- Ensure Adequate Progress at the Site;
- Provide Adequate Scope Drivers; and
- Facilitate Budget Planning and Execution.

EPA and CDPHE may also establish a few key outyear milestones (i.e., beyond FY+2) to provide long-term drivers for achieving the end of the Intermediate Site Condition.

Regulatory Milestone Change Control Process—A regulatory milestone that is established according to the provisions of RFCA shall be changed upon receipt of a timely request for change, provided good cause exists for the requested change. Requests for change shall be submitted no less than 30 days before the date of the regulatory milestone except for changes sought on the basis of a *force majeure*. Any request for change shall be submitted in writing and shall specify:

- The regulatory milestone that is sought to be changed.
- The length of the change sought.
- Good cause(s) for the change.
- Any related regulatory milestone or target date that would be affected if the change were granted.

Milestone change control shall be accomplished in accordance with RFCA, Part 11 (Budget and Work Planning), Subpart A (Budget Planning and Milestone Setting).

4.2.2 Project Authorization Basis/MAL

In October 1995, RFETS adopted a new Authorization Basis to govern (1) identification of desired work scope, (2) analysis of associated hazards, (3) identification of the standards and controls necessary and sufficient to address the hazards, and (4) explicit authorization of the work subject to the identified standards and controls. RFETS is currently in a transition period pending the complete implementation of the new Authorization Basis Process.

To accomplish work effectively at RFETS, the authorization basis process must be closely coupled with the processes for planning and budgeting work and work implementation. The first step to

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integrating these processes is to ensure that estimates for activities include the anticipated funding, schedule, and resources necessary to obtain the authorization basis required prior to commencement of work.

To assist in the transition to the new Authorization Basis process and to ensure work is properly scheduled and budgeted, work scope owners are required to follow the process described below.

Evaluate Work Scope and Identify Discrete Activities

The RFETS procedure, Activity Definition Process (1-R32-ADM-02.38, Revision 0) should be used to identify and describe specific activities within the scope of the work plan. This procedure describes how to segment work scope into manageable pieces such that the uncertainties and hazards can be effectively managed by identifying necessary and sufficient controls.

Describing activities using this procedure allows the work scope owner to maintain an adequate margin of safety against the hazards or other uncertainties presented by the work without being overly conservative.

Classify the activity type as either Baseline Activities of Mission Activities

Once activities have been defined, they need to be categorized as either Baseline Activities, or Mission Program Activities using the following definitions.

Baseline Activities are defined as those required to be performed by virtue of the presence of hazards at the site. If an activity is (1) a mandated control necessary for compliance with laws or regulations, or (2) required to maintain and control the existing level of hazard at the site, or (3) required to maintain a work space in a safe and habitable condition, then it is considered to be a baseline activity.

Mission Program Activities are defined as those which lead to a reduction in uncertainty or a reduction in the existing level of hazards at the Site.

Determine if Activities are Identified in the MAL

Review a controlled copy of the MAL to determine if activities are identified. If the activities are identified, check their status (Authorized for Performance, Authorized for Planning, or Unauthorized) to determine if it properly captures the scope of the work.

If the activity is appropriately identified and statused in the MAL, the integration of the authorization process into the work plan development process is complete. If the activity is not identified in the MAL, then the work scope owner will first need to determine if an authorization basis is required.

Determine if Authorization Basis Exists for Activities To Be Performed

If the activity is not identified in the MAL, then a determination as to whether an Authorization Basis exists needs to be made. This may involve collection of pre-existing data to determine if sufficient evidence exists to make this determination.

If it is determined that an authorization basis does exist, then the MAL needs to be updated using the MAL Change Control Procedure. If no authorization basis exists, then the work scope owner must incorporate the development of an authorization basis into the work plan.

Development of Authorization Basis

To develop an authorization basis to perform the desired activity, work scope owners will need to work with the Authorization Basis organization to ensure proper funding, scheduling, and resources accounted for in the work plan.

MAL

The MAL is a dynamic list of activities being planned or performed at the site, along with their associated authorization bases. This list constitutes those currently identified work activities which are either (1) a baseline activity necessary for performance due to the presence of hazards, (2) a mission program activity authorized for performance, (3) a mission program activity authorized for planning only, or (4) a currently unauthorized mission program activity.

Only those activities in the MAL that are authorized for performance or authorized for planning can be conducted at the Site.

The following definitions pertain to the Activity Status referenced in the MAL.

- Authorized for Planning (P)—"Authorized for Planning," for the purposes of the MAL, includes any work necessary to reach agreement on an authorization basis for an activity. The category "planning" was created by the MAL team to allow work to be conducted to define those controls necessary for performing an activity safely. This is a necessary pre-cursor to obtaining an authorization basis for the performance of an activity. The planning category allows this work to be performed prior to obtaining an authorization basis for the activity.

  The type of work covered by the planning category can include field evaluations of the "as is" condition, engineering, preparation of work documentation, safety analyses, project management, walkdowns, fabrication of hardware, training and hazard identification.

- Authorized for Performance (A)— "Authorized for Performance" means that an acceptable authorization basis has been documented and confirmed by DOE. A designation in the MAL of "Authorized to Perform" does not eliminate appropriate readiness reviews or safety screen requirements for activities to proceed to the operational phase. Approving these activities for actual performance requires that responsible management demonstrate compliance with the applicable authorization basis as required.

- Unauthorized (U)—An activity designated as "Unauthorized" on the MAL reflects unacceptable uncertainty or hazard levels associated with that particular activity. These activities are prohibited from being planned or performed until appropriate management approval is obtained.

Change Control for the MAL

Revisions to the MAL shall be done in accordance with site procedure 1-W16-ADM-02.39, Master Activity List Change Control.

4.3 AR/RECORDS MANAGEMENT/DOCUMENT CONTROL

4.3.1 AR

The AR is the completed compilation of documents relied on by DOE to select a response action for cleanup of a hazardous waste site. In accordance with section 113(k) of CERCLA, as amended by the Superfund Amendments and Reauthorization Act of 1986, RMRS will establish and maintain AR files for CERCLA response actions at or near the Site, using EPA policies and guidelines. Any future changes to AR policies and guidelines affecting the AR files shall be discussed by DOE, EPA and CDPHE and an agreement shall be reached on how best to accommodate those changes.

EPA, after consultation with CDPHE when necessary, shall make the final determination of whether a document is appropriate for inclusion in an AR. EPA and CDPHE shall participate in compiling the AR by submitting documents to DOE as EPA and CDPHE deem appropriate. DOE shall forward these documents to the RFETS AR files. Every AR file will be reviewed and approved by DOE, EPA, and CDPHE before the file is closed at the signing of the appropriate decision document.

Site-specific direction to employees is provided by Policy 2-27. Site procedure 1-F78-ER-ARP-001, CERCLA Administrative Record Program, establishes and defines the requirements and responsibilities for the compilation and maintenance of CERCLA AR files and completed ARs. Procedure 2-S65-ER-ADM-17.02, Administrative Record Document Identification and Transmittal Procedure, lists the specific responsibilities of RMRS personnel and provides instructions to AR personnel in the maintenance of AR files.

Four information repositories have been established to provide the public with access to the AR. A copy of the AR is accessible to the public at times other than Site normal business hours through the Public Reading Room at Front Range Community College.

Information Repositories:

U.S. Environmental Protection Agency
Region VIII
Superfund Records Center
999 18th Street, Suite 500
Denver, Colorado 80202-2466
(303) 293-1807

Citizens Advisory Board
9035 Wadsworth Parkway
Suite 2250
Westminster, Colorado 80021
(303) 420-7855

Colorado Department of Public Health and Environment
Information Center
4300 Cherry Creek Drive South
Building A
Denver, Colorado 80220-1530
(303) 692-3312

U.S. Department of Energy
Rocky Flats Public Reading Room
Front Range Community College Library
3645 West 112th Avenue, Level B
Westminster, Colorado 80030
(303) 469-4435

4.3.2 Records

The objectives of the Site Records Management Program are to identify, capture, protect and maintain active project records; index active records to ensure efficient and effective retrievability; safeguard records to prevent loss, damage, or unauthorized accesses; and turn over inactive records to

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the Site for disposition in accordance with approved retention schedules. Final records disposition shall be approved by RMRS and be consistent with the NCP, RCRA, CHWA, and DOE records retention schedules, whichever is longer. DOE shall make all such records or documents available to CDPHE and EPA upon request.

Site procedure 1-77000-RM-001, Records Management Guidance for Records Sources, provides detailed guidance on the Site Records Management Program. Procedures for implementation of the records management program elements identified in the above procedure are: (1) 2-N96-ER-ADM-17.09, Records Identification, Preliminary Preparation and Creation; and (2) 2-G18-ER-ADM-17.01, Records Capture and Transmittal.

4.3.3 Document Control

Document control is the process of managing the authorized release of specific documents and changes to ensure that only the most current, approved-for-release copies of controlled documents are utilized to perform Program activities including those that prescribe activities affecting quality and safety. Site procedure 1-77000-DC-001, Document Control Program, establishes requirements responsibilities, and instructions for the identification and control of controlled documents.

4.4 REPORTING

All reporting shall be done in accordance with established DOE HQ and Environmental Management policies and requirements. DOE-stipulated elements focus on cost, schedule, and technical performance against approved baselines. Additional reporting requirements established by RFFO are provided in site policy 1-R97-F&A-MCS-001, Management Control Systems and ER Project Control Management Procedures and Requirements.

RFCA Project Coordinators will meet at least monthly to discuss accomplishments, work in progress and anticipated work, potential changes to the baseline, implementation difficulties, compliance issues, opportunities for streamlining, and other matters of importance to implementation.

Quarterly, DOE will provide EPA and CDPHE with a progress report that describes progress toward implementation of activities covered by RFCA. Whenever possible, existing reports and databases will be used to fulfill this reporting requirement. Upon request, DOE will provide EPA and/or CDPHE with copies of project status reports on a monthly basis.

4.5 REGULATOR PARTICIPATION IN THE BUDGET AND PLANNING PROCESS

This section provides an overview of the Regulatory Agencies participation in the budget and planning process. Refer to Part 11, Subpart A, section 128-142 of the RFCA for detailed information regarding these interface points.

4.5.1 FY Activities

FY activities are those that occur during the current fiscal year.

April – May

Within 30 days following the completion of DOE's annual midyear management review, RFFO shall brief EPA and CDPHE on any decisions that affect regulatory milestones under the RFCA.

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July – September

DOE, EPA, and the CDPHE will evaluate the current schedule, cost and funding status of all projects in progress in the just-ending fiscal year, particularly those activities or projects that are on the critical path to meet regulatory milestones in the upcoming two fiscal years.

In addition, DOE, CDPHE, and EPA project coordinators will meet periodically through the fiscal year to monitor and discuss the status of projects scheduled during the year. DOE will promptly notify EPA and CDPHE of any proposed site-specific or programmatic action, if such action may have an impact on DOE's ability to meet the baselines or regulatory milestones of RFCA.

4.5.2 FY+1 Activities

FY+1 activities are those that occur during the current fiscal year and apply to the next fiscal year.

July – October

- DOE will consult with EPA and CDPHE in the development, verification, and review of draft work packages for FY+1.

- Review and revise baseline and regulatory milestones as necessary.

October – December

- Within 45 days after Congressional appropriation of the FY budget, RFFO and DOE-HQ shall brief EPA and CDPHE on the budget appropriation and tentative funding allocations for the new fiscal year.

- No more than 60 days after OMB apportions DOE funds, DOE, EPA and CDPHE shall evaluate schedule, cost, and funding status of projects for FY and FY+1.

If there is a delay in Congressional appropriations beyond the first day of the new fiscal year, RFFO shall inform EPA and CDPHE of any continuing resolutions, and of the impact of the delay on its ability to meet regulatory milestones and other requirements of the RFCA. EPA and CDPHE will review these actions and may recommend reallocation of available funds.

4.5.3 Cost Savings Initiatives and Productivity Improvements

DOE, EPA, and CDPHE shall consult during the RFETS budget planning and execution processes to identify and evaluate opportunities and incentives to improve productivity and reduce costs associated with environmental management activities at RFETS.

Standards, requirements, and practices shall be regularly reviewed to determine that activities at RFETS are conducted in a manner that is sufficient to achieve compliance with requirements and to protect workers, the public, and the environment, and necessary to accomplish the RFCA Preamble objectives expeditiously and efficiently.

Refer to Part 11, Subpart C, Section 151-155 of the RFCA for additional guidance on cost savings and productivity improvements.

5.0 PUBLIC INVOLVEMENT/STAKEHOLDER SUPPORT

5.1 BACKGROUND

Public involvement is a key element of most project and programmatic performance measures. A sufficient public involvement strategy, as part of routine project planning, is required by law. This summary describes how public involvement is conducted by Kaiser-Hill Community Relations in support of the DOE. In addition, the interaction between Community Relations and individual project/program managers is outlined. Finally, public involvement activities to meet requirements of NEPA, CERCLA, RCRA, and DOE Orders are detailed in the public involvement plan, as are supplemental activities which will further encourage public participation.

5.2 COMMUNITY RELATIONS

The DOE is ultimately responsible for public outreach and involvement that complies with all applicable state, federal and local laws and regulations, and DOE policies. The DOE Office of Communication and Economic Development (C/ED) is tasked with the mission of implementing public involvement activities. In support of the DOE C/ED, Kaiser-Hill Community Relations is tasked with planning/executing public involvement and information dissemination. With DOE C/ED oversight, Kaiser-Hill Community Relations performs a majority of the outreach and involvement activities at RFETS. From a project management standpoint, Community Relations should be involved in the earliest stages of planning or the project scoping process.

All public involvement is directed toward meeting these objectives: (as stated in the 1996 draft Community Relations Plan, not yet released)

1. Provide the public with a voice in decision-making processes, and ensure that the public's concerns will be addressed before undertaking activities.

2. Ensure that public involvement is conducted in compliance with all legal regulatory and DOE requirements

3. Build and maintain public confidence in RFETS commitments and abilities for safe operations and environmental stewardship by demonstrating that the public's voice is heeded, and its concerns are thoroughly considered.

4. Maintain current, and build additional, cooperative working relationships with business and community groups, local and state governments, regulators, and other stakeholders.

Kaiser-Hill Community Relations responds to the information needs of stakeholder, elected officials, and the broader public, including both external and internal key audiences and opinion leaders:

- Employees
  - Families
  - Unions
  - Subcontractors, consultants
- Public Officials and Government Agencies
  - Local, state and federal officials
  - State and federal agencies
  - Colorado congressional delegation, staff
  - Colorado legislature
  - Official oversight groups
- Media
  - Local, state, national
  - Metro print and broadcast
- Interested Groups and Individuals
  - Neighboring communities
  - Civic, state organizations
  - Business, technical organizations
  - Academic community
  - General Public

5.3 RESPONSIBILITIES

Kaiser-Hill Community Relations is responsible for the logistical and planning aspects of any public involvement plan or activity. In an attempt to build cooperative working relationships with the public and understand the public's expectations, and meet regulatory requirements, timing of outreach and involvement activities is crucial. Therefore, it is the individual project and program manager's responsibility to contact Kaiser-Hill Community Relations at the earliest planning stages. Further, funding issues associated with pubic involvement will directly impact the program or project budgets.